

Implementation Plan Review of the Classification and Management of Council Information

30 November 2023

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Acknowledgements

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Disclaimer

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Introduction

The purpose of this document is to implement the recommendations of the Review of the Classification and Management of Council Information as endorsed by Sunshine Coast Council at its Ordinary Meeting held 27 July 2023.

Overview

Sunshine Coast Council generates, receives and holds significant information in relation to the conduct of its functions, interface with customers and the community, and the delivery of projects, activities and resources. The appropriate management of the information generated, received and held by Council is critical to maintaining compliance with legislative and recordkeeping standards and to enable effective governance of the organisation. Managing this balance is essential to engendering confidence in Council's ability to meet its statutory and legal obligations while making available to the community as much information as possible, while protecting the confidential personal information held.

At the 27 July 2023 Ordinary Meeting, Council unanimously adopted the recommendations of the independent, external review into the classification and management of information held and generated by Council. Council also endorsed the development of a detailed implementation plan.

The external review was conducted by GWI who made six recommendations for improvement in its Future State Report (Annexure 1):

1. Improve how Council communicates its processes and efforts to make Council meeting information available to the public.
2. Update and operationalise Council's Information Access and Management Policy.
3. Update and operationalise Council's Custodianship Policy.
4. Review the scope and logical order of training modules and formulise a plan for the modules' completion.
5. Operationalise Council's Administrative Access and Right to Information Policy and Guideline
6. Ensure information systems that are a source of truth for Council's records and information have up-to-date information security classification labels.

The next phase of the project is implementation, which this document guides.

Implementation plan

The implementation of the six recommendations is anticipated to improve the accessibility of Council's information and afford greater transparency on how information is managed and released at Council.

The implementation of all six recommendations is a significant undertaking spanning all areas of Council and the analysis of hundreds of thousands of Council records. Full implementation may take a number of years and staff training will be an ongoing undertaking, extending beyond the conclusion of this review.

Table 1 below provides the detail on how each of the recommendations will be implemented and the current status of each. This table will be updated as milestones are reached but no less than quarterly.

Table 1 – Detailed implementation plan

Recommendation	Description	Status at 30 November 2023
<p>1. Improve how Council communicates its processes and efforts to make Council meeting information available to the public</p> <p><i>Why it is important:</i></p> <ul style="list-style-type: none"> Improves community perception of Council's commitment to operate in a spirit of openness and accountability in alignment with the RTI Act. Improves information findability on the Council website. 	<p>1.1 Create a page on Council's website that is dedicated to outlining:</p> <ul style="list-style-type: none"> Council decision-making processes Reasons for a Council meeting to be closed The types of Council information that will be considered confidential in accordance with <i>Local Government Regulation 2012</i> (Qld) Which information from Council meetings will be immediately available to the public How and when Council meeting information will be available to the public if that information is classified as confidential under section 254J of the <i>Local Government Regulation 2012</i>. <p>1.2 Create a register on Council's website to:</p> <ul style="list-style-type: none"> Inform the community of information that has been classified as confidential, including the reason for the required confidentiality (aligned to section 254J of the <i>Local Government Regulation 2012</i>) and predicted review/release date. Provide the community with links to Council meeting reports that are no longer classified as confidential. <p>1.3 Develop a communications plan to ensure the community is aware of how Council is ensuring transparency by improving publication of its practices around the management of confidential meeting information.</p> <p>1.4 Reassess community perceptions (within 12 months after the implementation of changes to the website) by sending the same survey form "Information Classification and Management at Sunshine Council" to the same recipients to identify the impacts of the changes made.</p>	<p>1.1 Commenced – website development underway (estimated completion December 2023)</p> <p>1.2 Complete – September 2023: Register of Public Release of Confidential Information - Statutory Meetings</p> <p>1.3 Commenced – will be annexed to this document on completion (estimated completion December 2023)</p> <p>1.4 Not started – scheduled for July 2024</p>

Recommendation	Description	Status at 30 November 2023
<p>2. Update and operationalise Council's Information Access and Management Policy*</p> <p><i>Why it is important:</i></p> <ul style="list-style-type: none"> • Ensures compliance with State Government guidelines. • Improves compliance with legislative and regulatory requirements. • Ensures information assets are appropriately secured. • Reduces risks and impacts for Council from the loss, compromise, or misuse of information. 	<p>2.1 Update the Information Access and Management Policy.</p> <p>2.2 Develop a supporting process for the application of security classification to Council's information assets.</p> <p>2.3 Create a process for conducting and capturing Business Impact Level (BIL) assessments across Council's information assets.</p> <p>2.4 Define security controls for the different possible BIL assessment outcomes which are commensurate with the assessed security levels (eg, more robust controls should be applied to information assessed as having a higher business impact level).</p> <p>2.5 Ensure records are labelled appropriately (where functionality exists) within source of truth systems by implementing the approach outlined in this report.</p> <p>2.6 Ensure security controls are consistently applied to information assets as per the developed BIL assessment process.</p>	<p>2.1 Complete – 10 November 2023 (Annexure 2)</p> <p>2.2 Commenced - draft guideline is due for completion and roll-out January 2024.</p> <p>2.3 Commenced – draft guideline is due for completion and roll-out January 2024.</p> <p>2.4 Commenced – draft guideline is due for completion and roll-out January 2024</p> <p>2.5 Commenced – the update to the classification labels is scheduled for 7 December 2023.</p> <p>2.6 Commenced – draft guideline is due for completion and roll-out January 2024.</p> <p>The guideline associated with this item will be published on Council's website on completion.</p>

Recommendation	Description	Status at 30 November 2023
<p>3. Update and operationalise Council's Custodianship Policy</p> <p><i>Why it is important:</i></p> <ul style="list-style-type: none"> Formalises information asset processes and highlights information assets' relevance to departmental services. Enables Council to establish accountability for information and data release decisions and approvals. Ensures Council's information assets are managed appropriately throughout their lifecycle. Reduces the risk of inadvertent release of information that is incorrect or out-of-date. 	<p>3.1 Update the Information Custodianship Policy to ensure it is aligned with the latest version of the Queensland Government's Information Asset Custodianship Policy (IS44).</p> <p>3.2 Develop information governance framework, including the establishment of an Information Governance Committee or Group.</p> <p>3.3 Define information governance roles and responsibilities, including for the approval of publication of Council's information and data (eg, administrative access).</p> <p>3.4 Identify appropriate stakeholders to fill the necessary roles and onboard them to ensure they are aware of their responsibilities.</p> <p>3.5 Identify, register, and classify Council's outstanding information assets in Council's Information Asset Register (IAR)*.</p>	<p>3.1 Complete – 10 November 2023 (Appendix 3)</p> <p>3.2 Commenced – Data and information working re-establishment scheduled for February 2024</p> <p>3.3 Commenced – draft guideline is due for completion late 2024</p> <p>3.4 Commenced – draft guideline is due for completion late 2024</p> <p>3.5 Commenced – draft guideline is due for completion late 2024</p> <p>The guideline associated with this item will be published on Council's website on completion</p>

Recommendation	Description	Status at 30 November 2023
<p>4. Review scope and logical order of training modules, and formalise a plan for modules' completion*</p> <p><i>Why it is important</i></p> <ul style="list-style-type: none"> Ensures training modules cover the information necessary for staff to confidently comply with and implement Council's policies and procedures. Ensures the development and suggested completion by staff follows a logical order (e.g., Information Security Classification module should be completed before Information Sharing module). Fosters an information management and recordkeeping culture across Council. 	<p>4.1 Review the scope of planned training modules to ensure they cover topics necessary for the implementation of this report's recommendations, including:</p> <ul style="list-style-type: none"> Information security classification Information custodianship roles and responsibilities Administrative access and RTI requests. <p>4.2 Review the logical order for the development and completion of information management-related training modules.</p> <p>4.3 Formalise a plan for the completion of modules by staff and ensure completion is monitored.</p>	<p>4.1 Complete – November 2023. Administrative access and RTI training commenced early 2022 and is on a bi-annual program. The second round of training is scheduled to commence in February 2024.</p> <p>4.2 Complete – November 2023</p> <p>4.3 Complete – November 2023 (Annexure 4)</p> <p>Staff training is scheduled to commence in February 2024.</p>
<p>5. Operationalise Council's Administrative Access & Right to Information Policy and Guideline (Annexures 5 & 6)</p> <p><i>Why it is important</i></p> <ul style="list-style-type: none"> Improves compliance with the RTI Act and IP Act which require government agencies to proactively disclose information unless there is a good reason not to. Reduces the number of RTI requests and subsequently reduce costs associated with the administration of requests. Establishes clear mechanisms and processes for the release of information to the public. 	<p>5.1 Develop a process for the identification of what type of information can be classified as "Public".</p> <p>5.2 Develop a process for the release of information classified as "Public".</p>	<p>5.1 Complete – December 2021. However, a further review is now required following the release of the Information Access and Use Policy and draft guideline which is due for completion and roll-out December 2023.</p> <p>5.2 Complete – December 2021. However, a further review is now required following the release of the Information Access and Use Policy and draft guideline which is due for completion and roll-out December 2023.</p> <p>The guideline associated with this item will be published on Council's website on completion.</p>

Recommendation	Description	Status at 30 November 2023
<p>6. Ensure information systems that are the source of truth for Council's records and information have up-to-date information security classification labels</p> <p><i>Why it is important</i></p> <ul style="list-style-type: none"> • Enables the consistent application of appropriate security controls to information stored in Council's source systems. • Ensures compliance with legislative and regulatory requirements. • Ensures compliance with the State Government guidelines. • Reduces the risk of inadvertent release of sensitive or protected information. • Reduces risks and impacts for Council from the loss, compromise, or misuse of information. • Reduces costs from the manual transfer of information between Council's information management systems. 	<p>6.1 Update information security classification labels within Council's primary records management system to ensure they are aligned with State Government's current labels.</p> <p>6.2 Review the current use of and need for existing caveats within the Council's information management system to allow for the classification process to be streamlined.</p> <p>6.3 Enable sensitivity labelling functionality within Microsoft 365 apps to allow for information to be appropriately classified in the source system.</p> <p>6.4 Assess possibility of re-establishing Council's meeting management system and information management system integration to reduce manual effort requirement.</p>	<p>6.1 Commenced – the classification labels are scheduled to be updated on 7 December 2023.</p> <p>6.2 Not started – scheduled to commence late 2024</p> <p>6.3 Not started – future planned but dependant on completion of other projects</p> <p>6.4 Not started – investigation to commence on completion of the above.</p>

** Source: *GWJ Future State Report 2022*

Implementation Schedule

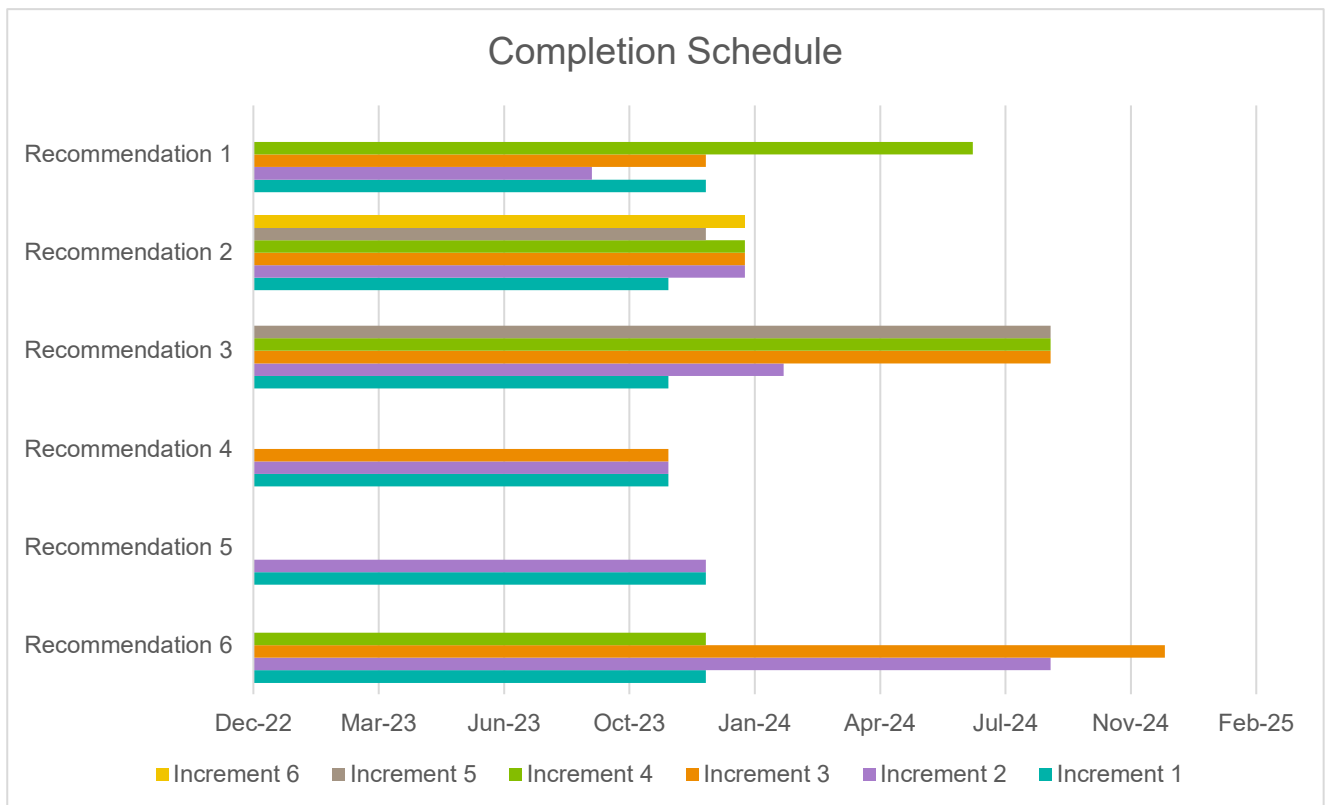
The full implementation of the recommendations of the external review will be achieved over a number of years. In particular, while the training plan and modules have been developed and training has commenced, the training required to embed new practices will be ongoing.

Figure 1 below provides an overview of when each recommendation and its supporting action items are scheduled for completion.

For reference, the six recommendations are:

1. Improve how Council communicates its processes and efforts to make Council meeting information available to the public.
2. Update and operationalise Council’s Information Access and Management Policy.
3. Update and operationalise Council’s Custodianship Policy.
4. Review the scope and logical order of training modules and formulise a plan for the modules’ completion.
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Figure 1 – Completion schedule



Performance monitoring

The six recommendations will be recorded in Council’s corporate reporting system and reported back to Council via briefing note quarterly. Those briefing notes will be published on Council’s website.

In addition, the website to be developed dedicated to the review in accordance with Recommendation 1, will be continually updated as milestones are reached but, in any event, no less than quarterly.

Finally, and also in accordance with Recommendation 1, the community will again be surveyed in July 2024 to gauge the success or otherwise of the implementation of the recommendations, that is, to ascertain whether the community are better able to access Council's information and, in particular, the information associated with the release of confidential information.

Conclusion

Council is committed to improving transparency and the accessibility of the information it holds. This review, in conjunction with existing projects facilitates and guides those improvements.

Community feedback is always welcome. If any members of the community wish to contribute, please email mail@sunshinecoast.qld.gov.au

Annexures

Annexure 1 – GWI Future State Report 2022

Annexure 2 – Information Access and Use Policy

Annexure 3 – Information Asset Custodianship Policy

Annexure 4 – Policy and Training Implementation Plan

Annexure 5 – Administrative Access and Right to Information Policy

Annexure 6 – Administrative Access and Right to Information Guideline



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