

# GAMBLING COMMISSION

## **Information Management Strategy**

## 1. Introduction and Purpose

- 1.1 The Commission published its first **Information Management Strategy** in September 2008 (IMS 2008)
- 1.2 The Commission published an internal update to this strategy in 2014 (IMS 2014), which was intended to renew the position of the Commission and to support the **Evidence Led Culture Strategy**, as presented to the Commission Board in May 2014. It also aligned with the principles outlined in the HMG **Information Matters** paper of 2012
- 1.3 The Commission later commissioned an external report to look at how Information Management and the use of Business Intelligence in particular could be improved. The report **Information Management Strategy Recommendations for Better Use of Business Intelligence** focused on how to ensure that there is efficient Business Intelligence collaboration between internal and external stakeholders and in doing so provided a further update to the IMS 2008
- 1.4 IMS 2008 established that information is a corporate resource having a recognisable and defined lifecycle, and that it must be valued, managed and protected as the other resources (people, money and buildings) of the Commission are

1.5 IMS 2008 set out a clear scheme for how the Commission would manage information across all areas of business, and the processes it needed to adopt. The strategy identified the ten principles upon which specific Information Management practices and policies would be based

1.6 IMS 2008 thus enabled the Commission to work towards more effectively managing and exploiting its information assets, and IMS 2014 re-affirmed the strategic priorities for Information Management at the Commission for the three years from 2014

1.7 This new **Information Management Strategy** (IMS 2018) now seeks to:

- I. Build on the strategies of 2008 and 2014
- II. Articulate a new vision for Information Management at the Commission
- III. Align Data Management with Information Management
- IV. Combine the ten principles of IMS 2008 in to new “core” principles
- V. Align to the **Corporate Strategy** and join to a new **Information Management Framework**

1.8 It is recognised that there is a programme of work to define and build a clear Data Management solution at the Commission. The future development of both Data Management and Information Management should be aligned and coordinated. They should also be aligned to the **Knowledge Management Strategy** (2016)

## 2. Definitions – What is Information at the Commission?

- 2.1 We can broadly define information as all the content that Commission staff use and produce daily
- 2.2 Information is generally either *quantitative* or *qualitative*
- 2.3 *Quantitative* information is “data with meaning” and is produced by organising data, as Business Intelligence for example. It is normally highly structured
- 2.4 *Qualitative* information is generally descriptive and unstructured and normally refers to all textual and graphical documents, reports, contracts, plans, project plans, emails, web pages, communications and so on
- 2.5 Data and information together build knowledge, and knowledge allows the Commission to make decisions, increase its influence, and act. Influence and action in turn produces results, and the review of those results provides us with more data, information and knowledge
- 2.6 There is a continuum between data, information and knowledge, and a model value-chain can be used to describe it, known as the DIKAR model:

*Data > Information > Knowledge > Actions > Results/Review*

- 2.7 For the purposes of this **Information Management Strategy**, “information” and “Information Management” should therefore be read and understood to broadly include and incorporate both data and information. Whilst the development and deployment of data systems, architectures and procedures for managing data is a specialism, Information Management is the overarching strategic concept

### 3. Context and Progress

3.1 Since 2008 the Commission has made progress in managing information as a key and valued corporate asset, and the recognition that information should be governed and protected as other resources are (people, money and buildings)

3.2 Since 2008 the Commission has recognised that the delivery of effective Information Management is dependent upon management of the information lifecycle stages;

*Collection or Creation > Storage > Retrieval > Presentation > Archive or Destruction*

3.3 The Commission has also made considerable progress in addressing key issues raised in the renewed IMS 2014, namely:

*“The risk we face in failing to satisfactorily deal with our Information Management requirements are significant. We cannot currently say with any certainty that we can readily locate all information in relation to an organisation or an issue. Information is routinely spread between a number of systems, and often resides in individual’s mailboxes. This leads to ineffective decision making, prejudicing decisions that we make and creates a reputational risk when dealing with stakeholders where we do not have all the information we need”*

3.4 Since 2014 the Commission has made significant progress in the priority areas of:

- **Improved records management** (addressing retention, availability, version control etc)
- **Efficient collaboration** (collaborative working with internal and external stakeholders)
- **Programme management support** (improved reporting and visibility, linking people and work streams)
- **Better use of Business Intelligence** (better ways to present and analyse the data we hold)
- **Improved mobile working** (different mobile phones, the use of tablets)

3.5 The deployment of and migration to Microsoft SharePoint and Office 365 has been a major step forward for Information Management at the Commission

3.6 The Commission established formal Information Management Governance in the form the Information Asset Group (IAG). Going forward there will be a new Governance body and framework. Details of the remit and role of this group are available separately on the corporate intranet (Hive)



## 4. Vision

4.1 This **Information Management Strategy** (2018) sets out a new alignment to the Commission's **Corporate Strategy** (see below) and a new set of core Information Management principles that align to a new **Information Management Framework**

4.2 Our vision is:

*To successfully combine Information Management with the experience, skills, knowledge and expertise of our people in becoming a first-class regulator*

*To successfully deploy Information Management in delivering the priorities of our Corporate Strategy*

*To become excellent as a regulator by continually improving our Information Management processes, practices, culture and systems*

*To build on our successes so far and to continue to use information as a highly-valued resource throughout the Commission*

4.3 Every day, staff at the Commission bring their experience, skills and expertise to the workplace, and combine it with their ongoing use of information. The combination of people and information is the backbone and cornerstone of everything the Commission does

4.4 Information is at the heart of the work of the Commission, and the Commission continues to regard information as a key and vital corporate asset, both for regulatory work and in providing the evidence and foundation for all business decisions, processes, activities and transactions

4.5 The Commission therefore continues to be committed to best practice in Information Management. The Commission will implement open but robust fit-for-purpose Information Management policies, practices and systems to ensure the creation, maintenance and protection of reliable information

4.6 The Commission is also committed to principles and practices set out in relevant government policies

## 5. Strategy

### Strategic Alignment

5.1 IMS 2008 established that information is a corporate resource having a recognisable and defined lifecycle, and that it must be valued, managed and protected as the other resources (people, money and buildings) of the Commission are

5.2 But it is recognised that neither IMS 2008 or IMS 2014 had any clear line of sight between the Information Management needs of the Commission and the **Corporate Strategy**

5.3 The *vision* statement at 4.2 means that the key strategic alignment of the new **Information Management Strategy** is the need to support the Commission's **Corporate Strategy**, published in 2018, and its five strategic priorities

5.4 The alignment to the **Corporate Strategy** is:

#### 1. To protect the interests of consumers

Using data, information and Business Intelligence to enable the Commission to help consumers understand the products and services they use and apply their rights. The Commission wants to use its own internal information more effectively and to make relevant public information more accessible and more meaningful for consumers, to help them understand their gambling choices at an individual level, and have easy to use, reliable tools to control it

#### 2. To prevent harm to consumers and the public

The Commission will use information to effectively focus on the prevention of gambling-related harm, as well as to help ensure that effective support and treatment is available for those who have already experienced harm

#### 3. To raise standards in the gambling market

The Commission wants to gather and use data and information to help stimulate a culture of trialling and evaluation to identify what works for the consumer. The Commission wants to see evidence of operators leading a culture of accountability to the customer first, as well as to the regulator

#### 4. To optimise returns to good causes from lotteries

The Commission will use data, information and Business Intelligence to ensure the continued success of lotteries, while also ensuring that lotteries are run in a way which is safe and fair for consumers

#### 5. To improve the way we regulate



The Commission aims to be a risk-based, evidence-led and outcomes-focused regulator. The management of high quality data and information through its lifecycle is vital to improving the way the Commission regulates

## 6. Information Principles

6.1 IMS 2008 established ten Information Management principles:

1. **Information is corporate resource**
2. **Information management is the responsibility of every employee**
3. **Information has a common vocabulary and data definition**
4. **Information is quality assured and fit for purpose**
5. **Information is accessible and secure**
6. **Information is shared**
7. **Information is not duplicated**
8. **Keeping records of what the Commission does with an agreed retention policy**
9. **Information is compliant with statutory and regulatory responsibilities**
10. **Information is maximised to the benefit of Commission decision making**

6.2 To deliver the five priorities of the **Corporate Strategy**, as outlined above, the Commission will now incorporate these ten principles in to a smaller set of “core” supporting principles for Information Management. These core principles form the basis of the alignment between this **Information Management Strategy**, the **Corporate Strategy** and a new **Information Management Framework**

6.3 These principles are:

1. **The Commission recognises the critical importance of information as an organisational asset and its vital role in delivering the Commission’s five strategic priorities**

The best-managed organisations recognise that information is a key asset - perhaps the most valuable asset they possess, after people. The Commission aims to realise the full potential of its investments in Information Management and optimize its role in meeting Commission strategic priorities

2. **The Commission will manage information effectively and appropriately, based on industry best practices, and in accordance with statutory requirements, standards and codes**

Improving Information Management is a key focus for the Commission, across all five strategic priorities. But improvement isn’t just about deploying new technology solutions, such as content or document management systems, data warehousing or other applications. It’s about integration of all information and embedding good Information Management practices across the range of Commission processes.

**3. The Commission is committed to the principles and practices of open data and information**

The Commission believes that continuous improvement in Information Management means that wherever possible - and subject to legal or statutory constraints - information, data and content can be freely used, modified, and shared by any Commission employee for any appropriate purpose within the Commission

## 7. Outcomes: Translating Strategy and Principles to Policy

### The Information Management Framework

- 7.1 As stated in both our vision and in our information principles, the Commission aims to become excellent at Information Management, by continually improving processes, practices and systems. The Commission recognises and seeks to capitalise on Information Management as a strategic organisational asset, making information openly available, as quickly and easily as possible
- 7.2 The vision and strategy of the Gambling Commission is to use Information Management to support the Commission's five priorities in the **Corporate Strategy**
- 7.3 The Commission will continue to take appropriate or required measures to protect information, including both business and personal information, for reasons of security or privacy, ensuring that information created, collected and stored is proportionate to the Commission's needs and is retained only for as long as it is needed
- 7.4 The Commission will ensure that all information is of the appropriate quality, and in the appropriate media
- 7.5 The Commission trusts that all employees will treat information as a valuable and respected corporate asset. Staff will take personal responsibility for their role in the effective management of information and make it accessible to those who require it to fulfil their duties, whilst ensuring that they are always aware of and respect the confidentiality of information they produce, share or receive
- 7.6 To do this, all staff at the Commission will manage information through a new **Information Management Framework** that translates vision, strategy and principles through to policies and practices for all staff
- 7.7 An overview of the framework is shown in Appendix 1
- 7.8 The Commission will continue to manage information through its full lifecycle, with continuous concentration on availability and quality:
- Collection or Creation > Storage > Retrieval > Presentation > Archive or Destruction*
- 7.9 The Commission will continue to comply with all relevant statutory and HMG guidance or requirements for public authorities, including:

Legislation / HMG guidance	Summary of Requirement
<a href="#">Computer Misuse Act</a>	This Act makes provision for securing computer material against unauthorised access or modification
<a href="#">Communications Act</a>	This Act makes provision about the regulation of the provision of electronic communications networks and services and of the use of the electro-magnetic spectrum
<a href="#">Consumer Protection Act</a>	An Act to make provision with respect to the liability of persons for damage caused by defective products
<a href="#">Electronic Signatures Regulations</a>	An Act to make provision about electronic signatures
<a href="#">Civil Contingencies Act</a>	An Act to make provision about civil contingencies
<a href="#">Copyright, Designs and Patents Act</a>	The statutory basis for United Kingdom copyright law
<a href="#">Companies Act</a>	The Act provides a comprehensive code of company law for the United Kingdom
<a href="#">Human Rights Act</a>	The Act makes it unlawful for any public body to act in a way which is incompatible with the European Convention on Human Rights
<a href="#">The Privacy and Electronic Communications (EC Directive) Regulations</a>	Which made it unlawful to, amongst other things, transmit an automated recorded message for direct marketing purposes via electronic communication, without prior consent of the subscriber
<a href="#">Freedom of Information Act 2000 (FOIA)</a>	The Lord Chancellor's Code of Practice issued under section 46 of the FOI Act 2000 defines the outcomes that FOI bodies should be meeting in the management of their records and information.
<a href="#">General Data Protection Requirements (GDPR)</a>	The GDPR was approved and adopted by the EU Parliament in April 2016. It will replace the DPA from May 2018. There are additional and different requirements to DPA, particularly in the areas of territorial scope, penalties, consent, breaches, rights to access, rights to be forgotten, privacy by design and the role of Data Protection Officers
<a href="#">Gambling Act 2005</a>	Makes provision for the exchange of information to support our statutory functions.
<a href="#">National Lotteries Act 1993</a>	An Act to authorise lotteries to be promoted as part of a National Lottery
<a href="#">Regulation of Investigatory Powers Act 2000 (RIPA)</a>	RIPA regulates the powers of public bodies to carry out surveillance, investigation and covering the interception of communications.
<a href="#">Security Policy Framework (SPF)</a>	The SPF focuses on security and information assurance practices that public authorities should have in place. This is underpinned by a wide range of good practice guides.
<a href="#">Government ICT Strategy</a>	This established the key principles of Information Management that public authorities should seek to apply.

Legislation / HMG guidance	Summary of Requirement
<a href="#">Government Service Design Manual</a>	This is the second phase of the Governments ICT Strategy focussing on the effective delivery of digital services.
<a href="#">The Information Assurance Maturity Model (IAMM)</a>	This is developed by CESG to assist SIROs in putting in place an effective change programme to improve information and records.

7.10 The Commission will continue to be part of and receive information from the Public Services Network (PSN) in order to work with strategic intelligence partners

7.11 The Commission will continue to deploy Business Intelligence tools to analyse datasets and present evidence and information through dashboards and corporate BI reporting

7.12 The Commission will continue to deploy and roll out the use of mobile devices such as tablets and mobile phones, subject to ongoing management of infrastructure, security, connectivity and performance

## Appendix 1: The Information Management Framework

*Note: This appendix is for guidance information only. Details in the actual framework are subject to change, amendment and update. Please refer to the separate framework documents for the latest details*

Principle	Policy – The Gambling Commission	Policy – All Users
<p><b>The Commission recognises the critical importance of information as an organisational asset and its vital role in delivering the Commission’s five strategic priorities</b></p>	<p>Provide the tools, training and support to embed good practice in Information Management as set out in this policy and other relevant organisational guidelines, use policies and protocols</p>	<p>1. Adhere to this Information Management Policy and to rules set out in other policies such as the Commission’s Information Security Policy, Acceptable Use Policy, Access Control Policy and Mobile Use Policy</p> <p>2. Attend training as appropriate and in accordance with their roles and responsibilities</p>
	<p>Embed an Information Management culture where employees take individual responsibility for managing information and are fully supported by their managers</p>	<p>3. Take personal responsibility for the information they create, receive, capture, maintain or share</p>
	<p>Include a review of employee Information Management performance in job evaluations</p>	<p>4. Ensure that information is accurate and fit for purpose and actively seek to resolve information accuracy issues when they become apparent</p>
	<p>Pay particular attention to the needs of employees new to the Commission or to the programme or team</p>	<p>5. Ensure that they understand the way that AllDrive is used within their team, work area, stream or programme</p>
		<p>6. Ensure that their electronic calendars are kept up to date at all times</p>
		<p>7. Ensure that they have the time and are able to embed good Information Management practice in their work</p>

	Recognise and capitalise on our information skills	8. Support the sharing of both information and information skills
<b>The Commission will manage information effectively and appropriately, based on industry best practices, and in accordance with statutory requirements, standards and codes</b>	Comply with all relevant statutory and regulatory requirements, especially the General Data Protection Regulation (GDPR), the UK Government Security Classification Policy (GSCP), and the ISO/IEC 27000 Information Security Standard	9. Adhere to Data Protection, appropriate access and information security policies and procedures, undertaking the required basic training (via Hive). Apply UK Government Security Classification Policy (GSCP) to all files and documents, and ensure that they are always aware of and respect the confidentiality of information they produce, share or receive
		10. Ensure that information created, collected and stored is proportionate to the organisation's needs
		11. Understand and apply corporate document controls, including content types, version control, retention, archiving and destruction
	Maintain a robust information life cycle, namely: collection, storage, retrieval, presentation, destruction	
	Ensure IT platforms are fit for the purpose of effective Information Management	
<b>The Commission is committed to the principles and practices of open data and information</b>	All systems and files should, in general terms, be open within the Gambling Commission. All Commission electronic	12. Adhere to the principle of "open by default" and make all information accessible to those who require it to fulfil their duties



	information and communications systems, and all of the files and objects that we use within them, should normally be open to all Commission staff	
	A file or object can be set to restricted access if it meets one or more of the Commission's restriction criteria	13. Ensure that if a file is restricted it is only done so in accordance with the Commission's restriction criteria