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INFORMATION ASSET MANAGEMENT PROCEDURE

Introduction and Aim

The Information Governance Policy stipulates that there is a requirement for Directorates to have an Information Asset Register detailing their key information assets. This procedure will set out the way in which information assets are managed with an Information Asset Register (IAR)

Linked Policies, Procedures and Written Control Documents
All corporate policies and procedures are available on the Public Health Wales website

Information Governance Policy

Scope

This procedure currently applies to those assets which contain personal data (see para 2 below) The procedure applies to all staff of Public Health Wales.

Equality and Health Impact Assessment	This procedure is subject to the EHIA completed for the Information Governance Policy IG EHIA Policy
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Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the Corporate Governance.

Summary of reviews/amendments				
Version number	**Date of Review**	**Date of Approval**	**Date published**	**Summary of Amendments**
1.0	01/10/2022	08/12/2022	11/01/23	First issue

1. Introduction

Public Health Wales maintains an Information Asset Register, which records all instances where personal data is held by the organisation.

There is no specific procedure to be followed for the Information Asset Register as it is closely linked to the Data Protection Impact Assessment Procedure. This document does however set out the roles and responsibilities connected with the Information Asset Register and provides links to the other procedures.

2. Definition of an Information Asset

Public Health Wales adopts the definition provided by the National Archives which defines an information asset as…

> …*a body of information, defined and managed as a single unit so it can be understood, shared, protected and exploited efficiently. Information assets have recognisable and manageable value, risk, content and lifecycles.*

Clearly this definition is open to quite broad interpretation and examples of information assets may include:

- Databases
- Spreadsheets
- Reports
- Records (including both staff and patient / service user)
- Systems (for the information contained in them)

Information assets can be broadly divided into two categories: Those that contain personal data, and those that do not. At the moment, only those assets containing personal data are entered on the Information Asset Register.

Personal data is the term used in the UK Data Protection legislation and is defined as:

> '*Any information relating to an identified or identifiable living individual*'

This is only part of the picture however. Data protection legislation relates only to *living* individuals, but the common law duty of confidence extends to the deceased. It is frequently necessary therefore to refer to the phrase *personally identifiable information (PII)* when personal data does not cover the situation. However as

both should be afforded the same levels of security and confidentiality, in the interests of brevity throughout this document, the term personal data is used to refer to both.

3. The Information Asset Register

As a data controller, PHW is required to maintain a record of all data processing activities. This is achieved by maintaining an Information Asset Register (IAR), in which all processing activities are recorded.

All Information Assets involving the processing of personal data must be subject to a Data Protection Impact Assessment (DPIA). This is described in full in the DPIA Procedure, but in summary the DPIA is in two parts, and depending on the level of risk involved there may be a requirement to complete just part 1 or the full DPIA.

4. Information Asset Owners and administrators

The Information Asset Owners (IAO) will be the person within the Directorate or business area who is responsible for the management of the information asset. Owners must be assigned to each individual asset, although it is quite acceptable for the same person to be responsible for the ownership of several assets. The IAO will normally be a senior manager in the Directorate or business area who is in a position to take responsibility for the asset and the make decisions as to its use.

The role of the Information Asset Administrator (IAA) will be to support the IAO in maintaining the Information Assets.

Training will be provided for Owners and Administrators.

5. Information Asset Impact Assessments

The Information Asset Impact Assessment is an annual audit of Information Assets, to enable PHW to demonstrate that it has a full understanding of the assets under its control. It does not need to duplicate what is already in the DPIA, but it should be used to confirm that the DPIA is still current, valid and accurate. It is also used to identify new risks associated with the asset and also ensures that the IAO is aware of the impacts of the loss or non-availability of the Asset would have on the business area.

The IAIA contains information on the location, size and owner of the asset as well as details on any documents associated, such as Data Protection Impact Assessments (DPIAs) that have been written for

specific projects or new processing) and any third parties we share that data with, or who complete processing on our behalf.

Responsibility for the management of the annual audit programme will be with the Head of Information Governance, whilst responsibility for completion of the annual IAIA rests with the Information Asset Owner, supported by the Asset Administrator.

6. Roles and Responsibilities

The Head of Information Governance will:

- Maintain and Information Asset Register for the organisation
- Ensure that an entry is made on the Information Asset Register for each completed DPIA.
- Provide training for Information Asset Owners
- Maintain an annual audit programme of Information Assets

Executive Team members will:

- Approve the creation of new Information Assets within their area of responsibility
- Ensure that IAOs are identified for each asset within their area of responsibility

Information Asset Owners will:

- Ensure that Information Assets for which they are responsible are managed in accordance with this procedure
- Ensure that Information Asset Impact Assessments are completed for each asset under their control
- Ensure that a Data Protection Impact Assessment is in place for all assets involving the processing of personal data (see above)
- Participate in an annual audit of Information Assets for which they are responsible

Information Asset Administrators will:

- Support the IAO in maintaining the Information Assets for which they are responsible

7.   Procedure

There is no specific procedure for maintaining or contributing to the Information Asset Register but the Register is maintained through

Maintenance of the Information Asset Register is subject to a Standard Operating Procedure held by the Head of Information Governance.

New Information assets are generated through the DPIA procedure.

8. Training requirements

The Head of Information Governance is responsible for ensuring that training is provided for those with responsibilities under this procedure.

9. Monitoring compliance

The Head of Information Governance will monitor this procedure to ensure it is compliant with current legislation and to ensure it is effectively implemented.

The Information Asset Register will be monitored by the Head of Records Management to ensure it is accurate and up to date.

10.   Records Management

All Information Assets are made up of a series of records. These are to be handled in accordance with the Records Management Policy and the Retention & Destruction Procedure. Currently, there is an Interim Guidance on Retention and Destruction and this document should be observed until further notice.

11. Location

The Information Asset Register is held within SharePoint Online and is managed by the Information Governance Service. The Asset Register is underpinned by a document library holding all documents associated with the individual assets.

12.   Further Information

The National Archive provides guidance and advice on Information Asset Registers.
http://www.nationalarchives.gov.uk/documents/information-management/info-asset-register-factsheet.pdf