

Merthyr Tydfil Local Service Board

Information Strategy



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1. Introduction

As Chair of Merthyr Tydfil Local Service Board (LSB) I am pleased to introduce you to this Information Strategy.

This is a partner focused strategy. All LSB partners are committed to a proactive and consistent approach to the sharing and effective management of information whilst working within the required legislation.

A key aim of Merthyr Tydfil LSB is to develop and build on existing 'joined up' service delivery to meet identified needs whilst continuing to develop its understanding of the communities it serves. Information should be managed to support new ways of working that will assist more cost effective service delivery whilst improving services to meet identified need. Working together with partners will enable Merthyr Tydfil LSB to make more informed decisions.

Information management is part of everyone's role. Information security has become a more prominent topic for public debate and it is of primary importance that the LSB's project partners protect all personal information. Accurate, current data/information should be held securely to maintain trust between the LSB, its partners and the public in general. Equality is important to us and any data/information provided to the LSB will be protected and handled appropriately.

Technology has transformed the way we work; access to information via web technology has become commonplace (e.g.) the internet; social media etc. There is an abundance of information in various forms and management of this asset poses some significant challenges (i.e.) security of information, communications, keeping pace with technological advances and legislative changes etc. Though there are risks to sharing information they will be proactively managed and a balance will be applied between sharing information and maintaining its security to ensure that we make the best use of this asset safely.

In introducing Merthyr Tydfil's Single Integrated Plan (SIP), the LSB has used an outcomes-based approach; managing the data collected effectively will enable us to answer key questions such as "What difference has the introduction of the SIP made?" and "Are we meeting the needs of the communities we serve?". Reviewing and evaluating the information collected will enable us to identify areas where further focus is needed and to act upon it. The future success of the SIP will depend on how well we can build our capacity to manage, share, protect and understand the information.

Mostyn James



2. Core Partners



3. Partner Commitment

The Information Strategy is vital to the development of the SIP and by approving this; Merthyr Tydfil LSB shows its on-going commitment to leading in these key areas and working together to achieve outcomes set down in the SIP.

Merthyr Tydfil LSB will demonstrate a commitment from all partners to an evidence-based culture so that information is used to drive services forward in a better, more efficient way. A collaborative, demanding and challenging approach will be taken to create better information. The LSB will demonstrate positive evidence standards leading to high data quality and sharing of information underpinned by the development and implementation of data-sharing protocols where appropriate.

4. Aim

The Information Strategy aims to develop an information culture in which:

- all members of the LSB understand the importance of information in relation to their roles;
- the informational aspects of integrated planning are fully taken into account;
- LSB partners will work effectively together to implement local public service reform;
- improvement in services for citizens can be achieved;
- all information is secured, and;
- information can be shared securely.

Merthyr Tydfil LSB seeks to have the **right information** available to the **right people** at the **right time** ensuring safety of information to support the **right decisions**. This will be underpinned by all partners adopting a co-ordinated approach to the use of information and data.

5. What we Want to Achieve

Acknowledging the findings of an Audit Commission report "*Is there something I should know?*" Merthyr Tydfil LSB aims to:

- Create a culture in partnership organisations that values the power of information and the responsibility of handling it;

- Utilise effectively the expert, professional, well-trained people working in partnership organisations;
- Develop good data quality and information that is shared effectively across partner organisations;
- The need for appropriate balance between openness and confidentiality in the management and use of information.

To achieve the above; a commitment has been made by all LSB members to adopt a collaborative approach to ensuring an evidence-based culture is in place to support better information. Sharing information can drive improvements for the customers. Established data sharing protocols will be used (where applicable) to achieve these goals.

Community “voice” is an essential component of information (e.g.) it supports the LSB to understand service user experience, how well are we doing, what we need to do better etc. Both traditional and non-traditional methods could be used for this (e.g.) questionnaires; social media etc. As part of the Regional Collaboration Board, Merthyr Tydfil LSB supports an EU-funded project in partnership with RCT LSB; this collaborative project has developed a web-based Engagement and Consultation Hub along with Citizens’ Panels to ensure the views of citizens are collected and considered when planning. This system will ensure all respondents receive feedback on what has happened following the end of the consultation period and how their views were considered in the decision making process.

Additionally, programmes such as Communities First and the VAMT-led MAGNET project will play a significant role in receiving feedback from a service user perspective which would further inform service design. Both projects listen to service users and are well positioned to undertake advocacy roles in the service design element.

6. What is information and Information Management Maturity?

Data	Data are numbers, words or images that have yet to be organised or analysed to answer a specific question.
Information	Produced through processing, manipulating and organising data to answer questions, adding to the knowledge of the receiver. This can be qualitative and quantitative.
Knowledge	What is known by a person or persons, involving interpreting information received, adding relevance and context to clarify the insights the information contain.
Information Maturity Model	An information management maturity model gives an accurate, reliable and honest summary of the current level of maturity of records management measures within an institution. It helps in: <ol style="list-style-type: none"> 1. Identifying and providing evidence of good practice in records management; 2. Providing evidence of compliance with the Freedom of Information Act and its’ code of practice; 3. Identifying areas for improvement; 4. Measuring institutional priority of records management as an operational or strategic priority.

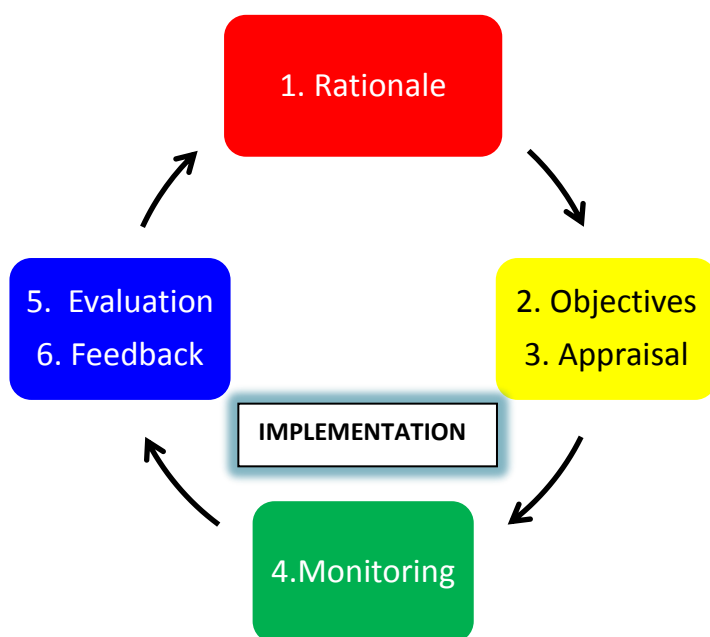
Note: Merthyr Tydfil LSB has not introduced an Information Maturity Model at this stage; however, this could be a future consideration.

7. Why do we need an Information Strategy?

Merthyr Tydfil LSB needs to understand what kind of information it needs to collect/collate.

There are many different types of information which are used for different purposes (e.g.) information can help develop an understanding of the needs of the communities, inform service design, support the development of robust performance management systems and enable comprehensive reporting to be achieved.

Using a tool like the ROAMEF model¹, we can clearly see the role information and evidence play on the on-going development and delivery of Merthyr Tydfil's SIP:



¹ ROAMEF stands for Rationale, Objectives, Appraisal, Monitoring, Evaluation and Feedback. Magenta Book, HM Treasury, 2011

Rationale	A review of high-level data informs LSB priority areas (e.g.) the Single Integrated Plan, our local projects etc.
Objectives/ Appraisal	In depth analysis of local data along with discussion with all stakeholders will support the LSB to identify the detail or story behind the data and inform future actions through our unified needs assessment.
Monitoring	Outcome monitoring will support the LSB to identify whether there has been any change in the population indicators and our performance measures – can we see an impact?
Evaluation / Feedback	On-going analysis of the data is required to review the SIP. Findings will support the LSB to answer questions such as ‘are the priorities still the right ones to meet the needs identified?’ It will enable the LSB to offer up to date feedback to stakeholders using a number of methods (e.g.) face to face, via its web page etc.

Preparing an Information Strategy will also enable the LSB to identify what knowledge and analytical resources are available which could be drawn upon. This includes the skills, knowledge, sector expertise and resources available not only within Merthyr Tydfil LSB itself but from our internal/external partners. Effective partnership working is the key to achieving the best outcomes

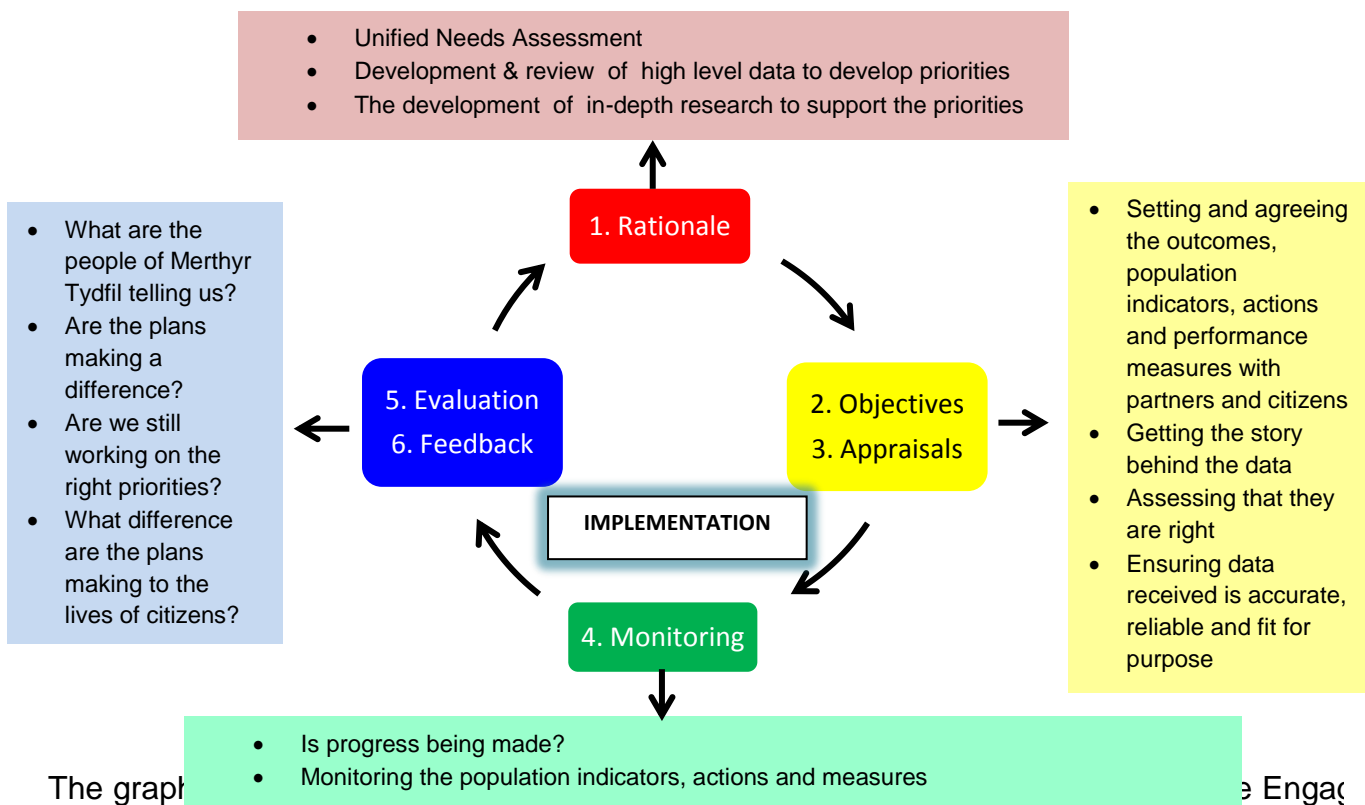
for the people of Merthyr Tydfil; particularly at a time where budget reductions are common and there's an increasing need to make efficiency savings. By identifying the priorities of all contributing partners, Merthyr Tydfil's LSB can identify the most effective means to address these priorities using limited resources.

The delivery of an effective SIP for Merthyr Tydfil depends heavily on the sharing of robust data and information between all partners. Contributing partners collect a wide range of information and data for their own work – this can range from quantitative data to support monitoring to qualitative data such as feedback/evaluation info gathered from those who live, work and visit Merthyr Tydfil. The Consultation and Engagement Hub will be a vital tool for both securing feedback from and providing feedback to stakeholders. It is essential all information is managed effectively so that effective transformation can be achieved.

Additionally, following the introduction of the SIP and the analysis of information needs, it has been acknowledged during discussions at SIP Steering Group meetings that partners need to be aware of their information responsibilities and may need to develop their systems accordingly. It is expected any required system change linked to management of data would be undertaken by individual partner agencies (if required) where that information is produced as a result of an organisation's activities.

8. What Information does the LSB need and what are the timescales for this?

By revisiting the ROAMEF model laid down in section 7, we can look at the type of information the LSB needs.



The graph Strategy, will support the LSB to identify the non-partner stakeholders and their information

The Unified Needs Assessment for the SIP also provides key information on what it's like to live in Merthyr Tydfil; it will support key priority areas which would need to be tracked; this will be

achieved through the measures listed under the priorities and will help the LSB establish what impact is being achieved overall by the SIP delivery organisations.

9. Uses of Information

Needs analysis	A full unified needs assessment required to be undertaken to determine the overall priorities that must be set. This should be a working document that is reviewed annually to ensure priorities identified continue to be responsive to the community's needs.
Statutory duties	The LSB needs to show compliance with all statutory requirements (i.e.) the Data Protection Act; Freedom of Information Act etc.
Performance measures	Baseline data should be collected prior to any intervention. This information should be included so that progress could be charted and the impact of interventions measured.
Intelligent outcomes analysis	Performance management should be undertaken to identify overall progress against identified outcomes; partner contributions and to strengthen opportunities for collaboration to deliver required outcomes.
Service users' experience	Ongoing consultation methods should be in place (e.g.) the Consultation and Engagement Hub, focus group meetings etc. These should be capitalised upon to highlight the quality of existing services received and ensure services delivered remain fit for purpose. This ensures any redesign of services to meet a (changed) need can be clearly identified and acted upon.
Front line information	Gathering feedback from front-line staff (e.g.) any employee with direct contact with customers/service users; will help to identify critical opportunities for early interventions in response to identified needs/barriers.
Stories	'Case studies' should be prepared to enable the LSB and its partners to demonstrate the difference made. Any roadblocks faced can be included and developed with details of how these were addressed and positive progress made. The basis of case studies can be highlighted from any 'input resource' (i.e.) from within the LSB, from its delivery partners (e.g.) MAGNET; Communities First etc., from members of the communities it serves etc.
Evaluation	It is essential to demonstrate both whether the LSB partnerships are making a difference and how they are doing so.

10. The Role of Partners in Information Management

All LSB partners will play a key role throughout the lifecycle of the SIP. They will support the key tasks related to the management of information by:

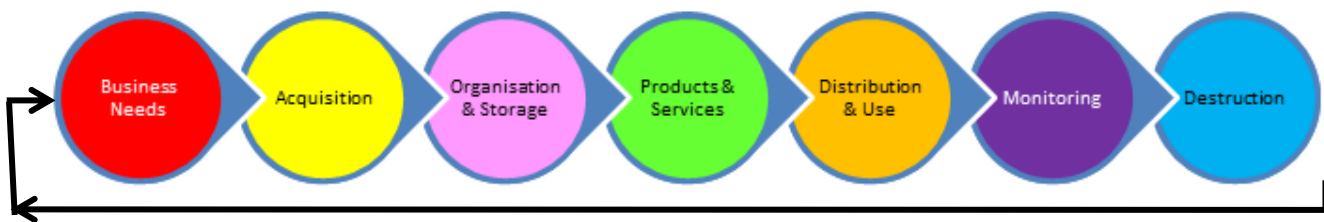
- Taking responsibility for the management of the data;
- Taking responsibility for the collection of the data from within their organisation;
- Providing information from their organisation;
- Help to identify gaps and development opportunities for better use of information;
- Having input to increase the information maturity;

- Developing a good understanding of the information gathered;
- Interpreting the information;
- Ensuring that the information provided is accurate, valid, reliable, timely, relevant & complete;
- Working together to ensure a commonality of interpretation;
- Awareness and implementation of their responsibilities.

11. How will information be managed?

All delivery partners will be responsible for the management of data/information that is produced as a result of their organisation's activities.

The generic cyclical flow of information management is shown in the graphic below:



There would be a requirement for all delivery partners to submit updates regarding progress against our population indicators and our performances measures; this will be achieved through the SIP Priority Leads. Partners must also ensure all data forwarded to the LSB is accurate, reliable and complete - this responsibility includes a requirement to ensure evidence supporting any outcomes claimed is available at the point the outcome is claimed. The LSB would expect data to be received in line with a reporting schedule (to be confirmed).

When information is received by the LSB, they will review this in line with the outcomes laid down in the SIP. This will enable LSB members to develop their understanding of the information gathered along with their knowledge of the services contributing to delivery of the outcomes set down in the SIP. A standardised Report Card has been developed using a Results-Based Accountability (RBA) format. This will be populated by SIP Priority Leads to offer updates on progress achieved against priority outcome areas as well as offering opportunities to list roadblocks encountered, areas for development etc. The Report Card will also offer LSB members further opportunities to develop a commonality of interpretation of data/information received.

Information management can be transformed by ICT; however, to be truly effective it also requires a culture of learning to exist across organisations with clear leadership from the LSB members.

12. Information Ownership, Governance and Assurance

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To develop trust between partners and to ensure information is safely managed and used appropriately (i.e.) for the purpose for which it was gathered; information ownership, governance and assurance are critical. This will be done by using the WASPI Framework which consists of an Accord and an Information Sharing Protocol.

The Accord – consists of a common set of corporate principles and standards under which partner organisations will share information. Signing up to the Accord records the commitment of each partner organisation, to meet agreed standards for the sharing of personal identifiable information, and to use the framework.

Many core partners of Merthyr Tydfil LSB have already signed up to the Accord, they include:

- Merthyr Tydfil County Borough Council;
- Cwm Taf Local Health Board;
- South Wales Police;
- South Wales Fire & Rescue Service;
- Merthyr Valley Homes;
- Wales Probation Service;
- Third sector agencies/organisations.

A list of all participating organisations for WASPI can be found by following this link: <http://www.waspi.org/page.cfm?orgid=702&pid=50179>

The Information Sharing Protocol (ISP) – identifies the operational data requirements to be shared for specific and lawful purposes.

The ISP details the:

- specific purpose(s) for information sharing;
- group(s) of service users it impacts upon;
- relevant legislative powers and the consent processes involved;
- data which is to be shared;
- required operational procedures and the process for review;
- Means of communicating to practitioners the specific operational requirements.

Essentially this is the “who, why, where, when, what and how” questions of sharing personal information. There is only one version of the Accord for Wales that partners can sign up to, whilst there will be many ISPs.

The key principles governing the Information Strategy are:

- the LSB aims to provide high quality information that is accurate, clear, relevant, reliable and in an appropriate format;
- information should be fit for purpose, accessible, produced in the most cost effective way, and supported by appropriate technical systems and trained staff, and thereby contribute to the effectiveness of the LSB;
- information systems should be integrated to facilitate data sharing and reuse systems, with appropriate security to protect the rights of data subjects and owners prevent unauthorised access;
- the range and quality of published information should be fit for purpose and organised and deployed to the benefit of the users;
- information should be available to all unless there is a good reason for it not to be;

- changes in the information needs of the LSB will be continuously monitored and staff will be encouraged to investigate and exploit new opportunities for use of information resources;
- ownership of and responsibility for LSB information will be clearly defined, and the authoritative source for key data will be drawn upon by any systems that require to use that data;
- all information to be secure, reliable, resilient and be operated in accordance with the UK legal framework.

All LSB members and partner organisations must agree to manage data/information in compliance with the 8 enforceable principles of good practice which are laid down under Schedule 2 of the Data Protection Act (DPA).

These principles provide that personal data must be:

- (a) Processed fairly and lawfully;
- (b) Processed for limited purposes and in an appropriate way;
- (c) Adequate, relevant and not excessive for the purpose;
- (d) Accurate;
- (e) Not kept longer than necessary for the purpose;
- (f) Processed in line with data subject' rights;
- (g) Kept secure;
- (h) Not transferred to people or organisations situated in countries without adequate protection.

Retained Documents

Merthyr Tydfil LSB will not hold original records containing personal information linked to activity feeding in to the SIP as routine. These details will be retained securely by contributing/delivery partners in line with the policies/procedures of their own agencies/organisations.

Merthyr Tydfil LSB will ensure any data/information they hold is retained safely and securely. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. This process will be periodically reviewed.

Disposal of Information/Records

Compliance with the principles listed above will ensure there is accountability for any decisions made by Merthyr Tydfil LSB to retain or dispose of a document, also providing a solid, efficient framework with which the LSB can undertake successful information management. Before disposal of any records, the Chair of the LSB should make an assessment of whether the record is ready to be disposed of. If so, the risks of disposal should be assessed. Disposal (11) is achieved by a variety of processes:

- Recycling;
- Treatment as 'confidential waste';
- Physical destruction on site or off site (paper records);
- Deletion (computer files);
- Transfer to an external body;

- Non-confidential disposal (i.e.) waste bin.

Much consideration must be given when deciding on an appropriate disposal technique. **In no circumstances should paper documents containing personal, confidential or restricted information simply be disposed of through the waste bin.**

Disposing of Confidential Information

All confidential information must be disposed of in a safe, secure manner. If confidential documents are to be disposed of, Merthyr Tydfil LSB will follow the procedure used by Merthyr Tydfil County Borough Council. A copy of this is available upon request.

Any documents classified as “public” (this refers to information that is already a matter of public record or knowledge, or information that can be released into the public domain) should be disposed of using office shredders/recycling bins.

A full, clear record will be made of all information/records disposed of.

13. Technical Implications

The LSB is committed to taking all necessary measures to ensure that its treatment of personal information, whether held on computer or manually, is compliant with the relevant legislation. A schedule of retention requirements linked to LSB documentation appears under Appendix 2.

14. Measuring Success

The LSB will work together to measure the success of this information strategy. Following development of the SIP Delivery Structure, Merthyr Tydfil LSB will develop systems to monitor progress based on:

- Working in partnership;
- Continuous improvement;
- Effective use of resources; and
- Information Sharing Protocols.

15. Delivery

A time-limited, small-scale LSB Information Management Task & Finish Group will be required to ensure that this strategy (and any associated action plan) will be delivered to meet the information management needs of the LSB. An officer from each core LSB partner organisation should be nominated to attend to ensure all aspects linked to their agency and area of work are considered / met.

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The timescale for Task & Finish Group meetings remains to be confirmed – it’s anticipated that this group will meet bi-monthly for a period of 6 months to ensure the ‘bedding in’ of the principles outlined in this Strategy. Once delivered, this group can stop meeting; however, regular review of the Information Strategy will be undertaken by the LSB Support Team to ensure it continues to meet the needs of the LSB and all delivery partners.

16. Review

The Information Strategy will be regularly monitored. Any required modifications/updates to its content will be made where appropriate following discussion and agreement by LSB members.

Issues such as information duplication and double handling reduce the accuracy and reliability of information with a cost of additional processing. Information handling practices will be audited so that these possible pitfalls can be address positively and removed where practicably possible. Also, the cost of collecting, maintaining and distributing information will be calculated as part of the process of review.

The success of any strategy that deals with abstract concerns such as 'information' is difficult to monitor and revise. Success is, perhaps, best gauged by measuring use of the systems, and encouraging users to feed comments back to the administrators of the system and authors of information. These mechanisms will be established for appropriate systems.

Glossary of Terms

TERM	DEFINITION
Data	Numbers, words or images that have yet to be organised or analysed to answer a specific question.
Information	Produced through processing, manipulating and organising data to answer questions, adding to the knowledge of the receiver. This can be qualitative and quantitative.
Knowledge	What is known by a person or persons, involving interpreting information received, adding relevance and context to clarify the insights the information contain.
Information Maturity Model	A business tool which aims to give an accurate, reliable and honest summary of the current level of maturity of records management measures within an institution.
Wales Accord for Sharing Personal Information (WASPI)	The WASPI provides a framework for service-providing organisations directly concerned with the health, education, safety, crime prevention and well-being of people in Wales. In particular, it concerns those organisations that hold information about individuals and who may consider it appropriate or necessary to share the information with others in a lawful and intelligent way.
Results Based Accountability (RBA)	This is a policy-making method that begins with the identification of goals and then moves on to analyse the specific means of achieving these goals. The 'goal' of RBA is to focus on the effectiveness of a programme rather than the effort expended to support better decision making.
Service Users	Anyone who is or could benefit from the service provided (e.g.) those who live in/work in or visit Merthyr Tydfil.
Personal Information	Information relating to an individual (including their image or voice) that enables them to be uniquely identified from the information on its own or from that and/or other information available to the organisation.

Appendix 1

Categories of information exempted from the principle of openness

The following categories of exemption are based on those published by the National UK Government in their 'Code of Practice on Access on Government Information'. The Local Service Board has adopted the following definition from that document:

"References to harm or prejudice include both actual harm or prejudice and risk of harm or prejudice."

In cases where harm or prejudice arise the Local Service Board adopts a similar view to that published by National Government namely, "it should be considered whether any harm or prejudice arising from disclosure is outweighed by the public interest in making information available". In addition, the principle that "the exemptions will not be interpreted in a way which causes injustice to individuals" is also adopted.

The following are exempted from the principle of openness:

1. Internal discussion and advice

1.1 Information the disclosure of which would harm the frankness and candour of internal discussions, including:

- internal opinion, advice, recommendations, consultation and deliberation;
- projections and assumptions relating to internal policy analysis, analysis of policy options and information relating to rejected policy options;
- confidential communications between departments, public bodies and regulatory bodies.

2. Law Enforcement and Legal Proceedings

2.1 Information covered by legal profession privilege.

2.2 Information whose disclosure would prejudice the prevention, investigation or detection of crime.

2.3 Information whose disclosure would compromise the security of any building.

2.4 Information whose disclosure would harm public safety or order.

2.5 Information whose disclosure would harm the life or physical safety of any person.

2.6 Information whose disclosure would increase the likelihood of damage to the environment, or rare or endangered species and their habitat.

3. Effective Management and Operations

3.1 Information whose disclosure would lead to improper gain or advantage or would prejudice:

- the position of the Local Service Board;
- negotiations or the effective conduct of personnel management, or commercial or contractual activities;
- the awarding of discretionary grants.

3.2 Information whose disclosure would harm the proper and efficient conduct of the operations of the Local Service Board.

4. Unreasonable Vexatious Requests

- 4.1 Requests for information which are vexatious or manifestly unreasonable or are formulated in too general a manner, or which (because of the amount of information to be processed or the need to retrieve information from files not in current use) would require unreasonable diversion of resources.

5. Publication and Premature Release in Relation to Publication

- 5.1 Information which is or will soon be published, or whose disclosure would be premature in relation to a planned announcement or publication.

6. Research, Statistics and Analysis

- 6.1 Information relating to incomplete analysis, research or statistics where disclosure could be misleading or deprive the holder of priority of publication or commercial value.
- 6.2 Information held only for preparing statistics or carrying out research, or for surveillance for health and safety purposes (including food safety), and which relates to individuals, companies or products which will not be identified in reports of that research or surveillance, or published in statistics.

7. Privacy of an Individual

- 7.1 Unwarranted disclosure to a third party of personal information about any person (including a deceased person) or any other disclosure which would constitute or could facilitate an unwarranted invasion of privacy.

8. Third Party's Commercial Confidences

- 8.1 Information including commercial confidences, trade secrets or intellectual property whose unwarranted disclosure would harm the competitive position of a third party.

9. Information Given in Confidence

- 9.1 Information held in consequence of having been supplied by a person who:
- gave the information under a statutory guarantee that its confidentiality would be protected; or
 - was not under any legal obligation to provide information and has not consented to its disclosure.
- 9.2 Information whose disclosure without consent of the supplier would prejudice the future supply of such information.

10. Statutory and Other Restrictions

- 10.1 Information whose disclosure is prohibited by or under any enactment, regulation, European Community Law or international agreement.

Appendix 2: Full list of LSB information needs and timescales

Information	Source	Timescale	Information Collector	Information Provider
Unified Needs Assessment	National & Local	Annually	Merthyr Tydfil LSB All partners will need to provide an update	All LSB partners linked to the local data
Population Indicators	National & Local	Annually	Merthyr Tydfil LSB All partners will need to provide an update	All LSB partners linked to the local data
Performance Measures	Local	Annually	Merthyr Tydfil LSB All partners will need to provide an update	All LSB partners linked to the local data
Further research	Local	Ongoing	Dependent on the research findings	All relevant LSB partners
Priorities	Local	Annually	Merthyr Tydfil LSB – lead for the Single Integrated Plan	All relevant LSB partners
Community Engagement & Service Level Experience	Local	Annual	Merthyr Tydfil LSB – lead for the Single Integrated Plan Making the Connections Officer	SIP Priority Leads / delivery partners
Stories (qualitative information demonstrating the difference made)	Local	Ongoing	Merthyr Tydfil LSB – lead for the Single Integrated Plan Making the Connections Officer	SIP Priority Leads - delivery partners
Personal data for any projects or service improvements	Local	Ongoing	Priority Leads – SIP Steering Group All partners will need to provide an update	All relevant LSB partners
Service level data	Local	Ongoing	Priority Leads – SIP Steering Group Merthyr Tydfil LSB – lead for the Single Integrated Plan	All relevant LSB partners
Commissioned services	Local Regional	Ongoing	Merthyr Tydfil LSB – lead for the Single Integrated Plan	All relevant LSB partners

References

1. ***“Is There Something I Should Know?”*** – Making the Most of your Information to Improve Services
Audit Commission - July 2009
2. **Wales Accord on the Sharing of Personal Information (WASPI)**
Welsh Government – May 2013
3. **LSB Support Network Presentation – Information Strategies**
Welsh Government – April 2012
4. **http://europa.eu/legislation_summaries/information_society/data_protection/l14012_en.htm**
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Treasury – 2011