

# Information Strategy Consultation and Engagement Summary

Summary report

April 2023

## Introduction

### Background and context

From October 2022 to January 2023, a consultation and engagement exercise was held to understand what the public, communities and organisations of Greater Manchester wanted to see in the Greater Manchester Information Strategy (GMIS) Delivery Plan.

Greater Manchester Combined Authority (GMCA) provided a consultation document and an online consultation on the GMConsult website for people to respond to. Additionally, the Information Governance and Research teams of the GMCA also engaged with several teams, networks, groups, and organisations through meetings and workshops. This activity took place between September 2022 and February 2023.

### Consultation and engagement

This document aims to provide a summary of the findings from the consultation and engagement period, bringing together both the online responses and responses received from meetings, events, and workshops.

This document is broken down into the six missions of the GMIS, which aim to tackle some of our basic challenges. The consultation asked 45 questions in total, covering each mission, and gave the opportunity to add any further comments. These questions aimed to provide an understanding of what people expected to be delivered by the GMIS. Comparatively, the engagement sessions were much more open sessions, inviting dialogue and discussion about potential considerations for the Delivery Plan.

The consultation itself had 20 direct responses, most of which were from individuals, with half of these being women, including trans women. The research team also spoke to 7 networks and groups, including information governance, equalities, transport, and housing groups.

Despite the number of respondents being limited, they were of high quality and detailed. Once all the responses had been collated, the team identified over 200 actions that had been suggested by the public, groups, organisations, and networks. The actions were then grouped into 28 proposed ‘deliverables’ – broad ranges of activities or actions to include within the Delivery Plan.

### Findings from the consultation and engagement period

Some overarching themes emerged from this process:

* Accessibility of information was important to the ensure transparency and trust. This was not simply about being open, but also in making information available for all – including in different languages – and being more proactive in being transparent and open.
* Community engagement was key here. Better links with communities, better representation of communities, and better use of information about communities was seen as a positive for fostering better relationships and greater trust.
* Organisations want help and support to do better, through guidance and toolkits. Though audits and assessments were mentioned, respondents valued peer networking and learning, shadowing and mentoring, and guides, toolkits and use cases as more helpful to prevent ‘re-inventing the wheel’ with regards to good practice. Furthermore, these toolkits and guidance need to be flexible to various levels of need.
* Information standards – including standards on how information is collected, presented, managed, shared, and used – were broadly seen as positive improvements. However, there was a thin line identified between setting standards and creating bureaucracy. In this respect, widely adopted national and international standards were seen as more beneficial than locally developed standards or frameworks.
* Governance of information policy issues in Greater Manchester should be more inclusive and representative of the people, communities, and organisations it affects. A range of suggestions were put forward to make the Information Board more inclusive, proactive, and representative, including making this more open to the public.

### Next steps

The actions and deliverables from this consultation and engagement work, along with the outputs of the prioritisation workshops will feed into the development of a Delivery Plan.

A series of workshops were held in late February 2023 to explore the prioritisation of these deliverables. The prioritisation of the deliverables will be summarised independently of this document and released separately.

## Findings summary

### Mission 1

**Foster trust between the people, communities, and businesses of Greater Manchester through greater transparency**

Respondents to the consultation and engagement sessions appeared to use the terms “trust” and “transparency” interchangeably, effectively equating one with the other rather than one as an outcome of the other. There were several suggestions to better understand the levels of trust across Greater Manchester through both academic and market research - engaging with as wide of an audience as possible through surveys, for example. Feeding back the outputs of this work to communities was seen as a crucial step, with the research and feedback being part of an ongoing relationship between organisations and communities.

Suggestions were also provided around the use of information and the associated trust. Respondents would like to see plain English versions of personal data rights; openly publishing Data Privacy Impact Assessments alongside projects; explaining clearly and more consistently why information is being collected and shared, how it will be used and how it will not be used (e.g., in policy, or in decision making); explaining how that the use of sharing of information will affect the people supplying the information; and developing case studies to explain how information might be used. It was suggested that auditing organisations could monitor this.

Throughout these suggestions, there was a focus on issues of accessibility, availability, and understandability of information. Suggestions for activities included more on translation of information – e.g. reports – into other languages; use of subtitles on videos; and the greater use of British Sign Language.

Overall, respondents wanted to see greater transparency in decision making, greater communication of information, and wider use and availability of data and information.

### Mission 2

**Promote and maintain the responsible and ethical use of information**

Standards – particularly standards for how data is structured and standards around the use of data – emerged as part of discussions on the second Mission. Respondents broadly shared a view that the Information Strategy should focus activity more on the implementation of good existing local, national, and international standards for information, rather than develop new standards. That is, while new standards were welcomed, more priority should be given to existing standards.

Furthermore, respondents suggested approaches to enhance more responsible and ethical practices. These included more regular staff training; auditing or assessing organisation’s approaches to information management and use; and identifying unnecessary data collection.

One framework that is already used in Greater Manchester is the [Declaration for Responsible and Intelligent Data Practice](https://www.declaration.org.uk/). The consultation showed a broad agreement that the GMIS should encourage organisations to sign up to the Declaration, with a view to standardising data governance services provided across Greater Manchester.

One suggestion was that, to evaluate the success of this mission, organisations should be transparently self-aware, submitting assessments and sharing the number of complaints to the ICO or data breaches more openly. This approach was echoed in various responses throughout the consultation and through engagement sessions.

### Mission 3

**Establish inclusive and proactive governance to drive the strategy**

The Greater Manchester Information Board (the Board) is an established group of public, private, and third sector organisation representatives that provides guidance and strategic direction around information policy in Greater Manchester. It is a non-statutory advisory board, supporting activities across the city region. Respondents were asked whether the Board should become more of a decision-making body, especially in relation to the Information Strategy. There was a mixed response to this. Overall, responses seemed to favour the Board remaining in an advisory role.

Respondents identified that expanding the diversity and representation of information policy governance[[1]](#footnote-2) was important to bridge the divide between perceived and actual performance. Providing updates and feedback on services, representing the diversity of Greater Manchester, and making sure information was accessible to all are key components of building trust and ensuring information policy governance is inclusive.

Three specific organisations were mentioned to be included in the governance structure of the strategy: the [Responsible Tech Collective](https://medium.com/responsible-tech-collective); the [University of Manchester’s computer science department](https://www.cs.manchester.ac.uk/); and, Salford Disability Forum, but it was highlighted that it shouldn’t be limited to these. To be inclusive, information policy governance should include other organisations and communities such as charities, transport organisations, and retail organisations.

Another element addressed by respondents was about how the strategy can be suitable for a pan-GM approach. Examples included linking police and health systems better and considering data standards and schemas. A set of comments also suggested horizon scanning and planning in resilience, both for trends and possible responses or resilience (hacks, fires etc), to ensure the strategy was proactive in its ability to be used.

One push back concerned the governance arrangements in Greater Manchester. Some comments highlighted the array of committees and layers of internal governance across Greater Manchester-level organisations. It was suggested that reducing the number of committees would create efficiency savings and move the focus towards delivery instead of reporting. It was further suggested that access to business intelligence dashboards would support a greater focus on delivery.

### Mission 4

**Enhance the skills, capabilities, and behaviours for good information management**

Mission 4 looked at the improvement, frameworks, and adoption of good information management. This brought up the need for good tools to support workers and sharing of best practice as actions – rather than the strategy giving organisations (big or small) more things they had to do. It was also mentioned that the phrase ‘information governance’ culturally is associated with blockers and a campaign to re-educate on the benefits of good information governance could be valuable.

Good information management was seen as much of a behavioural issue as it is a strategic issue – good behaviour is generally seen as a given and already active across GM, but as a starting point, good behaviours should be adopted as part of the strategy. However, it was argued that good information management behaviours should be audited or assessed, and that they should be developed in a way that ensures they include relevant local representation and groups, possibly through public engagement.

To ensure that the mission is progressing, some proxy measures were identified to look at during a periodic qualitative review, such as if the principles are adopted across GM or how many skills gap analyses are conducted within organisations.

### Mission 5

**Develop and implement the tools, infrastructure and standards needed to manage and use information properly**

The responses to Mission 5 highlighted the need for individual organisations to be able to use the strategy to address their challenges and needs to use information properly.

Whilst there needed to be scope for flexibility, there was also a reflection on it potentially being beneficial if organisations used the same tool for managing, using, and presenting information – such as the Census. There was a mixed response as to what would be the best approach to address this; some felt that auditing organisations to understand what tools and databases they currently used would be useful, but there was pushback that this shouldn’t be a priority and may be too bureaucratic.

On the topic of management, there was a broad view that ‘less is more’ – respondents showed a desire to not overcomplicate management, as this may lead to barriers for organisations, not solutions.

Another topic that was highlighted was the consideration of the wide variety of data that is used across Greater Manchester, from file formats (e.g. CSV, GeoPackage) to the type of data it is, and the details provided about this data. Having a set format and standards for datasets would mean that information sharing between organisations would be as seamless as possible. It was noted that not all organisations would be able to adhere to a national or set standards due to the sensitive nature of some data – such as in organisations that support victims of domestic violence.

Having an if appropriate adoptable standard may be of use to some, but consideration is needed to ensure that the information is shared and used responsibly and ethically.

### Mission 6

**Create an information governance framework for Greater Manchester that acts together as one**

Overall, the responses to Mission 6 were supportive but it was seen that the strategy should encourage the use of respected and consistent tools, not force organisations to use them. Furthermore, it was felt that the GMCA should lead by example of good practice and adoption.

As recognised in the response to other missions, respondents shared that the strategy needs to have the right level of detail and be adaptable for different organisations.

There was a broad consensus that the strategy should also focus on creating a community for information governance, to share and learn about the approach and adoption – not just provide a framework, this could be done through meetings and possibly a virtual workspace.

### Other comments

Some comments received either fell broadly across the range of the Information Strategy or did not directly align with any one Mission. The online consultation also contained a specific section to provide constructive criticism about the consultation, aims of the strategy and the governance arrangements in Greater Manchester.

Whilst there was an overall support for the strategy, it was noted a few times that it was an ambitious approach – it was not felt that all aspects of the Missions were possible. Whilst being ambitious was seen in a positive way by respondents, it was emphasised that the ambitions need to be achievable.

The consultation and engagement process was seen as comprehensive, although this was linked to it being lengthy and there was a suggestion for a shorter approach.

A final point made was about the independence of organisations with respect to information sharing – such as groups supporting women and girls experiencing violence and abuse. The independence of these service providers from existing government, administrative, legal, or police systems is what makes them a trusted service, and encourages engagement with them. The costs of sharing information on services users with the public sector may outweigh the benefits. While the public sector may be able to better coordinate activity to support individuals, the perceived lack of independence may reduce the numbers of people coming forward to use the service. It was argued that the Strategy should recognise the independence of these organisations, to ensure that they remain trusted service providers.

## Appendix A: Identified deliverables

The information gathered from the consultation and engagement exercise identified around 200 potential actions that could be taken across Greater Manchester. These ranged from actions that were small scale and feasible, to options that were large-scale, or would be significantly less feasible to implement. To aid with the prioritisation of actions in the Delivery Plan, these actions have been grouped into broad areas of activity, which we have called ‘deliverables’. The list of identified deliverables is included below.

* **Better information accessibility:** Accessibility is more than just openness. Accessible information means that all people can access and use information. Making information more accessible means taking actions that make it open to people who may require different languages, different formats, or clearer explanations.
* **Better information communication:** When information is released or shared, that should be communicated clearly and comprehensively to all. This means using simpler, clearer language; avoiding ‘buzzwords’ or jargon; and being less vague when we talk about data and information.
* **Better information signposting:** Part of making information more accessible is thinking about where it is placed. If people cannot easily find the information they seek, this can lead to distrust and a feeling that information is being ‘hidden’. Being clearer about what information is shared, and where people can access that, can help to reduce distrust. Signposting, or having consistent locations for the public to access information about an organisation, will help to improve trust and transparency.
* **Better use of data:** Many organisations have access to a wide array of information. But often, it is not used to its fullest potential as it is kept in silos. Better use of data within organisations – for example, when talking about schools, using the unique school reference number produced by the Department for Education, alongside the name of the school, so that people know which school is being referenced. But it is also about using tools correctly to make this more widely available – for example, using open standards for sharing non-personal information.
* **Communicating information policy:** Information policy is a complex and wide ranging area, covering aspects of regulation and law relating to personal or commercially sensitive information; the use of a variety of digital tools to collect, process, manage, store, and share information; policies on open data and open standards; and data ethics and responsible use of information. To help improve trust in organisations and organisations’ use of data, we need to be better at communicating what information policy covers; Greater Manchester’s position in these areas; and the different roles that organisations play in the implementation of information policy.
* **Communicating information rights:** Not everyone has perfect knowledge about their information rights. There are misconceptions about what information can be shared, and what rights individuals have and do not have when organisations access, use, or share their information. For example, people have the right for their information to be deleted, but not in the process of an active criminal investigation. Campaigns and communications about people’s rights – especially when people’s information is being collected – will help to improve trust in the management and use of people’s personal information.
* **Community engagement:** An important aspect of the Information Strategy is being more inclusive – engaging more audiences, listening to more voices from a variety of backgrounds, and taking their views on board. Feedback suggests that generally smaller organisations, community groups and third sector organisations do not feel like they have a voice. This deliverable would focus on engaging with a wider community, and ensuring more of these voices are heard, and listened to.
* **Countering misinformation and enhancing trust in information:** Trust is a complex issue. One aspect of it is trust in information – in data used to support arguments, or trust that information held is correct. Being more open about decisions, and the trustworthiness of information, can be crucial in helping to reduce distrust and to counter misinformation.
* **Developing guidance and tools:** Consultation feedback suggested that while there is a lot of information on the rules and regulations organisations should follow, there was a lack of detail on how specifically to implement these rules internally – for example, through templates, tools and guidance. These tools and guidance could cover an array of subjects, including applying information governance principles, guidance on applying data schemas, or putting in place tools that help organisations work better (for example, a digital Data Protection Impact Assessment tool).
* **Developing information management standards:** Information management standards would be set levels of service that organisations might be expected to meet when managing information assets. For example, this could include developing a skills gap analysis to understand what skills might be needed within an organisation.
* **Developing information standards:** Information standards focus on what information is collected and recorded about certain subjects. Having consistent standards means that each organisation can collect and compare the same information, and it means that people can be confident knowing the same information is comparable. For example, the numbers of planning applications received in one district is comparable with the number received in another; or that information about expenditure at one local authority is comparable with expenditure at another.
* **Engaging with related policy teams:** Everyone manages, shares, and uses information in different ways. Information policy therefore covers multiple thematic policy areas – from digital infrastructure and tools to legal compliance, to how information is used to inform policy. This deliverable would seek to ensure that information policy is linked with other policy areas in Greater Manchester.
* **Enhancing and strengthening governance:** It is important that there is oversight of the development and implementation of information policy. This includes ensuring that there is broad agreement on areas of information policy, such as the development of guides and tools, engagement and support, and Greater Manchester-wide approaches to information management. In order to best do this, governance and oversight groups need to have the strength and broad membership to bring a range of perspectives to delivery of the Information Strategy.
* **Implementing data ethics:** Acting responsibly and ethically with information can be supported by introducing guidance, tools, processes and procedures that put ethical data use at the forefront of any project. This deliverable aims to put in place these elements, to ensure people know that the use of information in Greater Manchester can be trusted.
* **Implementing information standards:** This deliverable is about putting in place data schemas and standards so that information is consistent, comparable, and useable. These standards may have been developed in Greater Manchester, or may be national or international standards – for example, a standard for open data to be released in a format that allows anyone to use it; or a standard for the way demographic data is collected.
* **Improving approaches to data ethics:** When attempting to put in place approaches to data ethics, there may not be any existing guidance or support. This deliverable looks to encourage more organisations to consider the importance of data ethics, and what they can do to act more responsibly and ethically when collecting, managing, sharing, or using information. It may be more of a first step, such as agreeing to abide by a range of principles.
* **Improving digital infrastructure:** The tools and infrastructure we utilise affects how we manage, share and use information. For example, each organisation may use a different provider when sharing large files or documents. This adds unnecessary complexity, when the aim – especially among the public sector – is to work together for the benefit of the people, communities and businesses of Greater Manchester. Improving the systems and infrastructure to be simpler, easier to use, and to better safeguard individuals’ information is important for us all to work better together.
* **Improving information governance services:** Each organisation has different approaches, investment in, and capacity to deliver information governance services. This deliverable aims to support Information Governance teams to put in place the best practice and the right processes across the public, private, and third sector.
* **Improving information management standards:** For people to trust organisations with their data, they need to trust that their approaches to managing information meet certain standards. This deliverable looks at what processes and procedures could be adopted across Greater Manchester to improve the level of information management across the city region.
* **Improving information sharing approaches:** Different organisations use different tools and different approaches to share documents and information. This creates needless complexity, and a requirement for organisations to sign up to multiple tools and services, making it more difficult to manage information sharing in each organisation. This deliverable focuses on what can be done collectively to improve the way information is shared, while protecting the rights of individuals and organisations whose information may be shared.
* **Inclusive governance:** This is a part of one of the Missions of the Information Strategy – to create a proactive and inclusive governance structure. For governance and oversight to be trusted, it needs to be representative of the communities and people it serves. This deliverable aims to expand the organisations and communities represented in reviewing and implementing information policies and approaches in Greater Manchester. It may involve inviting in more voices, opening governance meetings to the public, or ensuring that there are inclusive practices in sharing governance decisions.
* **Monitoring and measuring success:** To understand our impact with the Strategy, it is necessary to monitor and measure the impacts of the work being conducted. This deliverable will look at what indicators truly show that we are achieving the Missions of the Information Strategy, that in doing so we are aligning with its Principles, and that overall we are creating a better information ecosystem.
* **Networking, peer learning and sharing best practice:** Each organisation is at a different stage of its information management journey. It is important that we learn from one another’s mistakes and share best practice as widely as possible. This deliverable aims to support different organisations on their journey, by linking up organisations through networking, events, sharing best practice, and more in-depth collaboration such as mentoring or shadowing.
* **Opening up more data:** To be a transparent, organisations need to go beyond their statutory requirements to make information open. They must consider what information they might have access to that could also help the people, communities, and organisations of Greater Manchester, and whether making that information open would benefit society. This deliverable looks at the recommendations for making more data and information open to the public about Greater Manchester, and the organisations that work here.
* **Understanding emerging information policy:** Information policy is a vast and complex area. With new technological and regulatory changes happening daily, it is important that Greater Manchester is not left behind, and that we respond to the challenges – and opportunities – emerging from these changes. This deliverable aims to better understand emerging areas of policy, such as the use of machine learning, automated decision making, and artificial intelligence. It seeks to understand the impacts - both positive and negative – to better inform policy decisions at a city regional level.
* **Understanding trust:** While it is understood that some organisations are trusted more than others, it is not understood to what extent, or why. Developing a deeper understanding of which organisations are trusted – and why – can help other organisations put into place best practices to better engage with different communities, and build long-lasting, trusted relationships. This will help organisations better support the communities they serve.
* **Using procurement to improve information ecosystem:** Procurement is a powerful tool in encouraging positive or desired behaviours. From recyclable packaging to improving food quality, it has been used to ensure that procured goods and services meet local, national, or international standards. Procurement can therefore be a great tool in encouraging good behaviours and processes when considering information management, sharing, and use. This deliverable looks at how procurement practices can best support improved, and trusted, delivery of services.
* **Using the right tools when using information:** A range of tools are available to analyse and use information. Some help to make decisions, others provide analysis and support. Choosing the right tools and encouraging the use of those tools that promote the best practices, while safeguarding the rights of people and communities, can help to develop good standards and trusted uses of information.

1. ‘Information policy governance’ here is used to represent the governance of policies, procedures and approaches to information management, sharing, and usage in the city region. This is not the same as ‘information governance’, a specific role within organisations that aim to ensure the organisation is meeting its regulatory requirements around managing information. [↑](#footnote-ref-2)