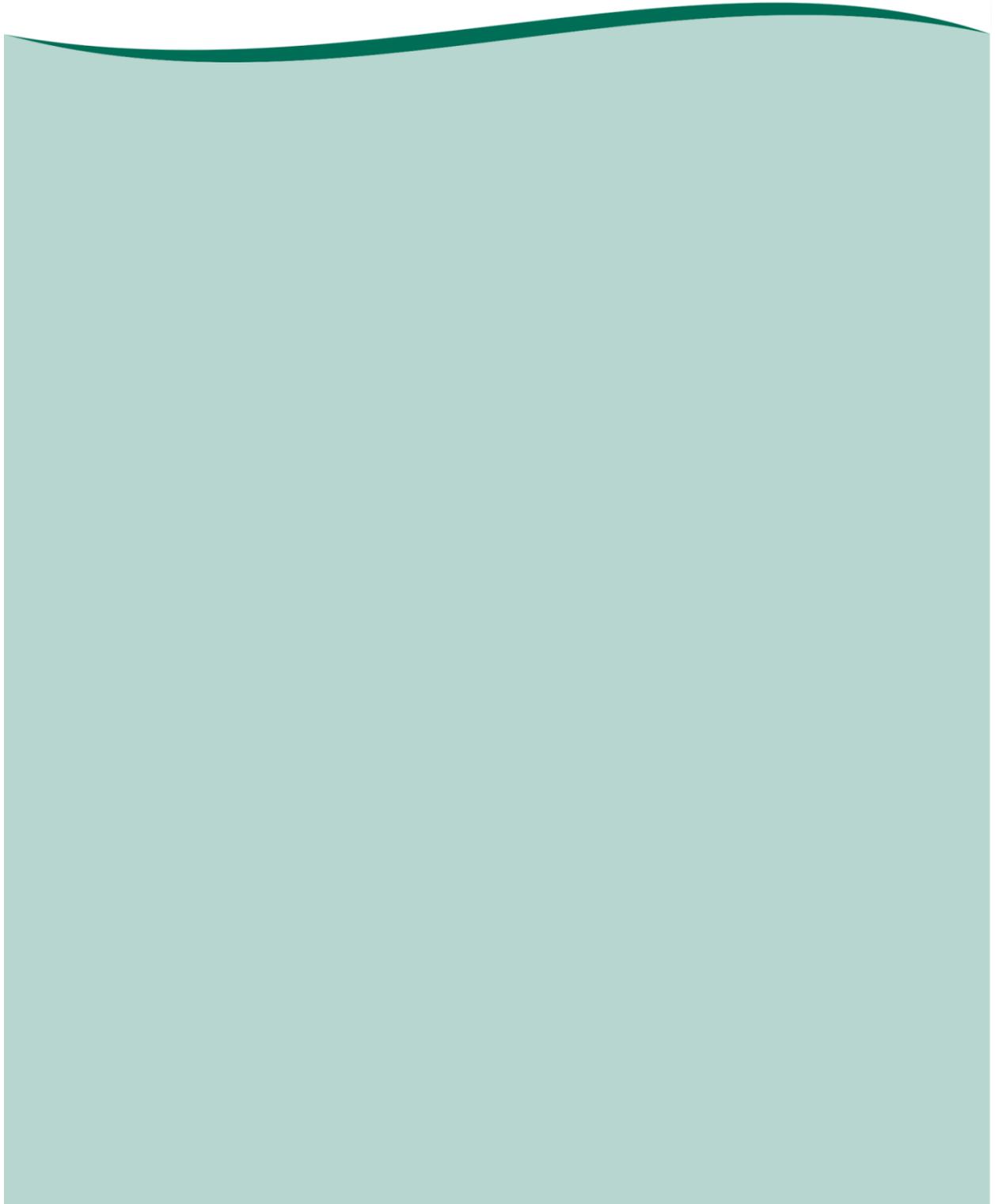


# Policy for sharing information via SharePoint Collaboration sites



Document Control

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<b>SIRO signature</b>			

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## **Related documents**

Reference should be made to the following policies and guidance:

- a. [Wiltshire Council privacy policy](#)
- b. [Wiltshire Council data protection policy](#)
- c. [Information Governance Communication and Engagement Strategy](#)
- d. [Guidance notes on safe and secure delivery of personal information](#)
- e. [Information asset change policy](#)
- f. [Information Asset Policy](#)
- g. [Information Governance Policy](#)
- h. [Information Security Policy](#)
- i. [Governance Management Framework](#)
- j. [Privacy Impact Assessment Policy](#)
- k. [Records Management Policy](#)
- l. [Retention schedule](#)
- m. [SharePoint Governance](#) (draft)

## **Legal framework**

- a. Data Protection Act 1998

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## **1 Introduction**

- 1.1.1 Wiltshire Council (the council) needs to collect, process, and, in some cases, share, information to provide services to the public.
- 1.1.2 SharePoint is the system used by the council to manage and share information internally and externally. Collaboration sites enable information to be shared between services, or with third parties.

## **2 Purpose**

- 2.1.1 The purpose of this policy is to identify key considerations to be addressed prior to using collaboration sites to share information, and to clarify individual responsibilities within the process.

## **3 Scope**

- 3.1.1 Collaboration sites are used to share information where there is a regular need to share, and where the sharing would otherwise be done via email or other non-secure methods.
- 3.1.2 Where systems and software used have built-in methods for sharing, these should be utilised rather than Collaboration sites.
- 3.1.3 The use of SharePoint provides a platform to share information easily; this must not result in unnecessary or inappropriate sharing of information.
- 3.1.4 This policy is aimed at any staff planning to share information internally or externally, using collaboration sites.

### **3.2 Internal Collaboration sites**

- 3.2.1 Internal Collaboration sites are used to share information between council teams from different services.

### **3.3 External Collaboration sites**

- 3.3.1 External Collaboration sites are used to share information between the council and third parties from other organisations.

### **3.4 Sharing Information between the council and Wiltshire Police**

- 3.4.1 Where there is a requirement to share information between the council and Wiltshire Police this should be done using External Collaboration sites.

## **4 Responsibilities**

- 4.1.1 Everyone working for or with the council has a personal responsibility to safeguard its information assets.
- 4.1.2 Prior to sharing information there must be suitable legal justification, and appropriate documentation, e.g. data flows, data sharing agreements and privacy impact assessments.

4.1.3 Collaboration sites will be requested via the ICT portal, and will follow the Information Asset Change process where necessary.

## **4.2 Collaboration site Requestor**

4.2.1 The requester will be required to complete full details of the proposed sharing including but not limited to:

- a. Information to be shared
- b. Reason for sharing
- c. Length of time information will be shared for
- d. Details of internal departments and teams to have access
- e. Details of third parties site to have access

## **4.3 Information Asset Owners (IAO)**

4.3.1 Each Head of Service is the IAO for their service area and is responsible for all information collected, processed and shared in their service.

4.3.2 IAOs will be required to sign off requests to create collaboration sites, and must ensure that the sharing is appropriate in line with council and statutory requirements.

## **4.4 Information Governance (IG)**

4.4.1 The IG team will review the request, and flag up any concerns or additional documentation requirements. Once all the requirements are met, the request will be signed off.

## **4.5 ICT**

4.5.1 ICT will create a basic collaboration site on receiving appropriate approval.

4.5.2 ICT will set the any internal permissions, as specified in the request, using existing pre-populated AD SharePoint groups.

## **4.6 SharePoint Champions**

4.6.1 The SharePoint champions will be responsible for:

- a. Creating any libraries or lists which are required;
- b. Notifying team members of site details for population, including ensuring that teams are aware of who has access to the site, and the information in it;
- c. Maintaining site permissions, including creation of any non-standard sharing groups, and carrying out any changes to sharing after the site is provided by ICT and removing any access which is no longer required;
- d. Inviting authorised third parties to access the collaboration sites.

- e. Ensuring that any changes to a collaboration site, such as a new recipient, or a change to the category of information shared are approved via the change process prior to carrying out those changes.

#### **4.7 Other service areas/third party responsibilities**

4.7.1 Each service or third party information is shared with will need to be made aware of their responsibility for the information.

4.7.2 Anyone using the collaboration site must adhere to the agreed limitations of

- a. What information can be shared;
- b. How that information can be used;

### **5 Considerations**

#### **5.1 Type of information**

5.1.1 Whilst much of the council's information can be shared between services or with appropriate third parties, the following types of information must only be shared under certain conditions.

5.1.2 Any service or staff handling these types of information must have been trained in data protection and must be aware of the conditions.

- a. personal data
- b. sensitive personal data
- c. information given in confidence

#### **5.2 What you want to share and why**

5.2.1 Consideration must be given to the purpose of information sharing, and sharing must be limited to what is required to achieve that aim.

5.2.2 Access to information *must* be appropriately restricted; and only shared with the teams and third parties who need it for agreed purposes.

5.2.3 Where at all possible, information should be anonymised, e.g. when information is shared for reporting or statistical purposes.

5.2.4 This information will be recorded as part of the collaboration site request.

#### **5.3 Consent**

5.3.1 Where appropriate, does your service have consent to share the information with other services? Is the subject aware that you intend to share their information with other services, and do they understand the purpose of that sharing?

5.3.2 Consent must be recorded.

## **5.4 Accuracy of information**

5.4.1 If the information is extracted from a system then it must be up to date and accurate on the Collaboration site.

## **5.5 How long information will be shared**

5.5.1 Regularly review whether the need to share the information still exists, and check that any conditions are met.

5.5.2 If a data sharing agreement changes or ceases – then the information must be updated or removed from the Collaboration site. This also applies if the conditions of consent change or cease.

5.5.3 Where notice is given, the change should be made in line with the date of the change to the sharing agreement. Otherwise the change should be made as soon as possible after the date of the change to the sharing agreement.

## **5.6 Changes to information sharing via collaboration site**

5.6.1 If you are making significant changes to the information you already share, or if you intend to share information which is not already being shared, then the change must be submitted for authorisation IAO and IG approval using the Service Portal collaboration site request.

## **6 Retention**

6.1.1 If a Collaboration site is not accessed for more than X amount of time, it will automatically be deleted.