(Do no) stop making sense*

Interpretation of information governance in a mental health organization

Twenty years has only enlarged my interest in the *value* of information

2011	Arkin: CIO
2008	UvA: start research in IG*
	KPMG: Information/ Knowledge management
2001	
	Aranea: ICT infrastructure
1999	
	Philips: software development
1996	
	TU Delft: software development
1993	
	MsC in mathematics

Experience in:
- Big data (mathematics)
- Software development
- ICT operations
- Risk management/audit
- Information management
- Knowledge management
- Governance

*Kooper, M., Maes, R., and Roos Lindgreen, E. (2011). On the governance of information: Introducing a new concept of governance to support the management of information. International Journal of Information Management , 31(3), 195-200

In all my jobs I experienced that organizations do not optimally use information…

Example

Effectiveness measurement (ROM) and Diagnosis

Evaluate result and remeasure (ROM)

Example

Design personal health plan

Health recovery program

…e.g, ROM is required by the insurer, but not used as information in the health program!

This example is illustrative: it implies a lot of organizational effort…

From the point of view of…

- Compliance: ROM is a valuable measurement
- Big data: the ROM measurement has limited value

More importantly…

- Health recovery: ROM has NO value to the effectiveness of the health program

…but from a business point of view this is not a satisfactory outcome

In 2008 we started with the idea of information governance…

By getting a better understanding of information:

- Information is the content of sense making interactions, as well as its result
- Hence, unlike data, information contemporaneously constitutes content and process, including its actors and the information environment

Creator

User
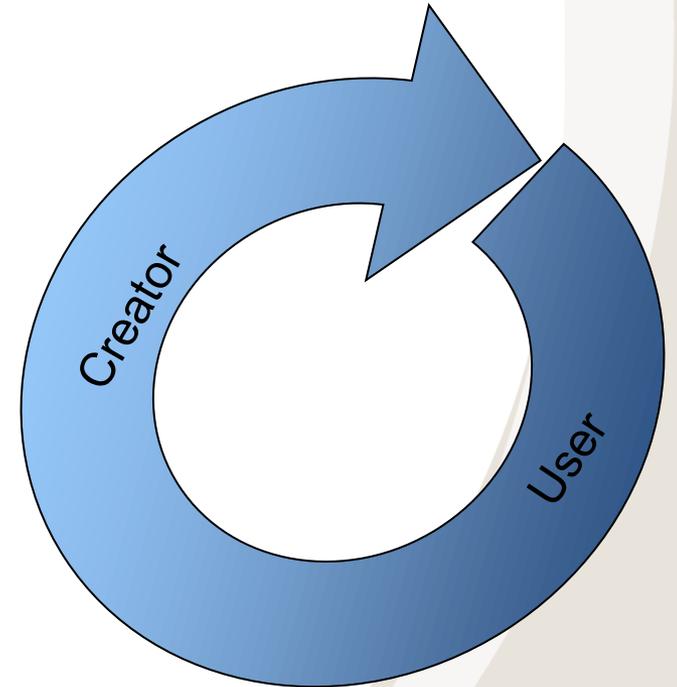
We concluded that information use can be influenced through both management *and* governance

Information governance is the set of activities aimed at establishing a normative foundation to facilitate and stimulate informational interactions

We made a clear difference with IT governance…

- *IT* governance is not concerned with the way information can be created, sought, consumed, processed and exchanged in order to add value to a business, but it solely focuses on managing the resources that eventually must be deployed to achieve such a goal, and the associated risks

- IT governance exclusively inhabits the "*control*" half of the business universe, including administration, policymaking, responsibility, authorization, reporting, monitoring and audit. IT governance relies on the paradigm that IT investments and the resulting IT systems can and must be *controlled* in order to be successful

…and with the actual approach to information governance

We used a deviant starting point…

Knowing that organizations that show good information use practices, also show good business performance*,
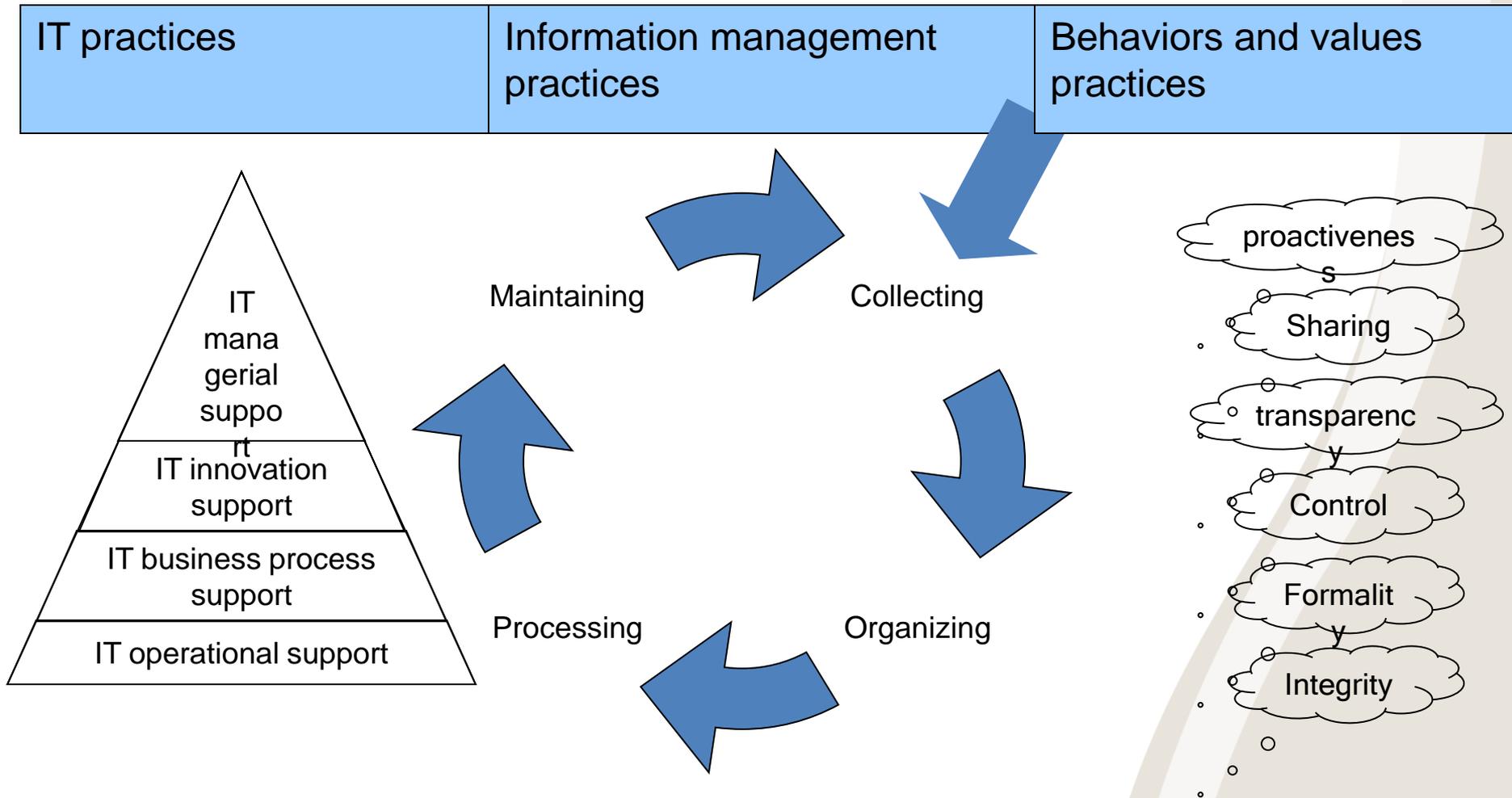
That creativity, intuition and experience are just as important as goal-directness, criteria of efficiency and working 'according to rules'**,

and with the consideration that IT, devoid of the context of how people behave with information, and how information is managed, will not explain the performance relationship

*Marchand, D.A., W.J. Kettinger, and J.D. Rollins (2001), Information Orientation: The Link to Business Performance, Oxford University Press, Oxford
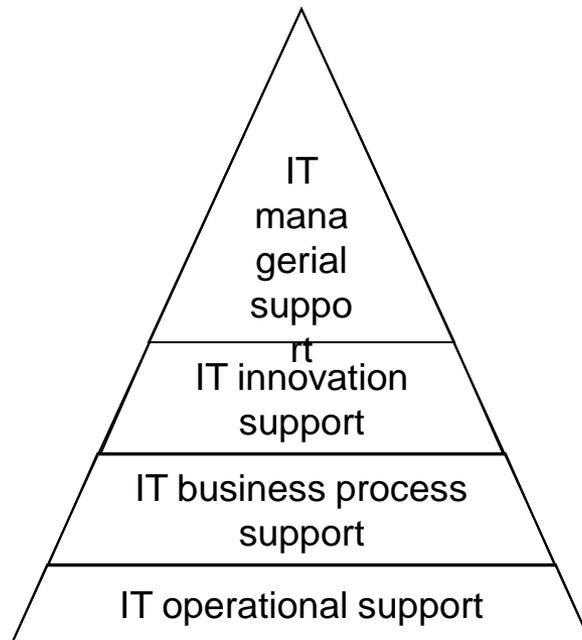**Kooiman, J. (2003). Governing as governance. London: Sage publications

Starting with the three capabilities of Marchand *et al*…

IT practices	Information management practices	Behaviors and values practices

IT managerial support

IT innovation support

IT business process support

IT operational support

Maintaining

Collecting

Processing

Organizing

proactiveness

Sharing

transparency

Control

Formality

Integrity

…where it requires both management and governance to organize those…

IT Governance

IT managerial support

IT innovation support
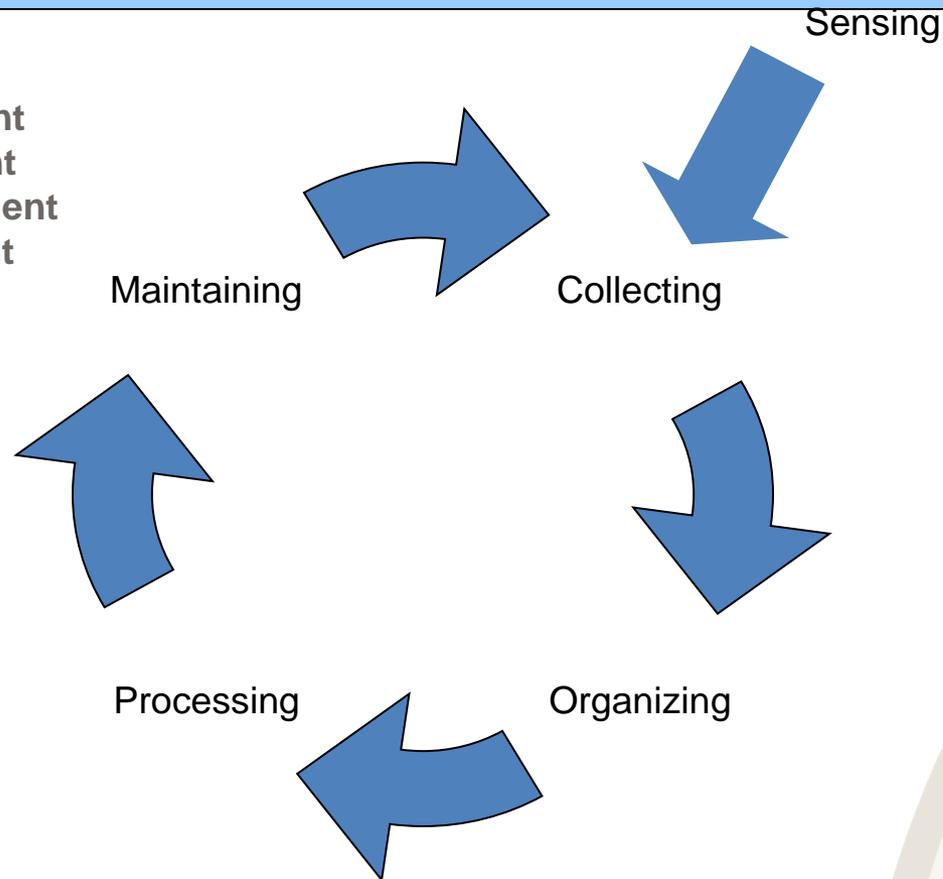
IT business process support

IT operational support

- IT practices asks for good IT management (ITIL, BISL), and

- good IT governance (COBIT)*
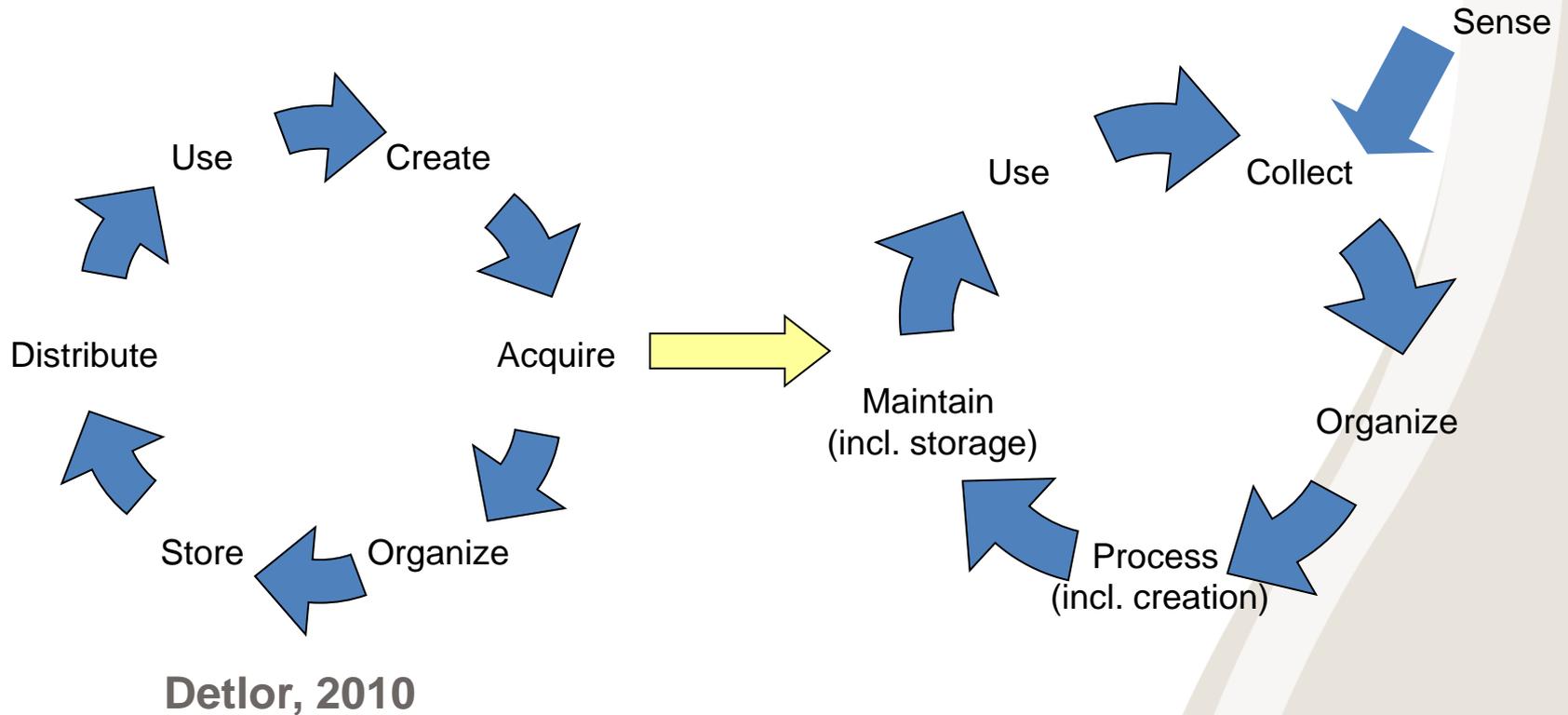
…and making a difference between IT and information…

Weill, P., and J.W. Ross, (2004), IT Governance – How Top Performers Manage IT Decision Rights for Superior Results. Boston: Harvard Business School Press.

…where IMP is a generic name for various forms of information management*…

Information management practices

1. **Records management**
2. **Content management**
3. **Document management**
4. **Context management**
5. **Information lifecycle management**
6. **Et cetera**

Sensing

Maintaining

Collecting

Processing

Organizing

*J. Hagmann, (2013) "Information governance – beyond the buzz", Records Management Journal, Vol. 23 Iss: 3, pp.228 – 240

…that we define as a combination of 'creator' and 'user' activities…

Use — Create — Acquire — Organize — Store — Distribute — Use

Detlor, 2010

Sense — Collect — Organize — Process (incl. creation) — Maintain (incl. storage) — Use

The lifecycle is managed and should be governed with…

**Detlor, B (2010), Information management, International journal of information management, 30, 103-108

…Information governance to cover both Behavior and IMP
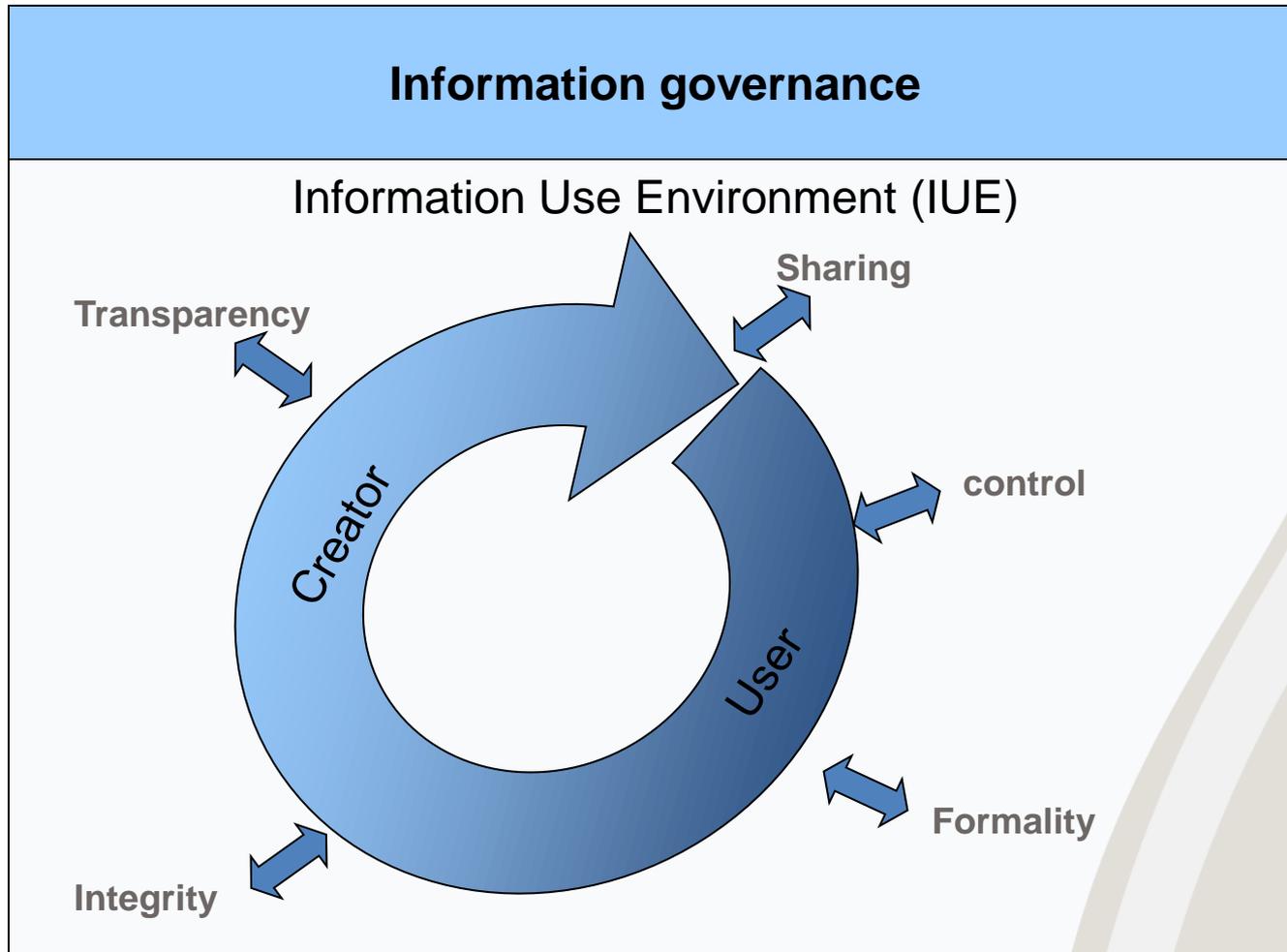
Clear from a theoretical point of view, but it leads to questions…

- Does the CIO have adequate tools and skills to effectively focus on policies and developments that are information-centric?

- Or to go even a step further: is it the CIO who should take these questions into account?

- And can information governance indeed be an effective framework for all three capabilities?

Does the CIO have adequate tools and skills?

Probably not the current CIO type:

- Most CIO's come from the IT practices silo and have different skills than IMP and Behavior require

- Unlike the management of IT, there are no generic tools available for IMP

- Information behavior from an organizational perspective is a relatively new topic.

Answer:
At this moment it depends on the adequacy of the CIO

Is it the CIO who should take these questions into account?

Information orientation is a much broader topic than information technology:

- Information Management Practices can be dedicated to a specialized function (library, control), but can also be part of (integral) management

- Behavior is an HR related capability

Answer:
Organization and management of ITP and IMP might be a responsibility of the CIO, but information governance is probably better assigned to the CEO

Can information governance indeed be an effective framework for all three capabilities?

- We stress that 'control' should not be the central theme of the governance framework

- IT governance covers the IT practices in Marchand's model

- As Kooiman states: governance is a combination of three types of interactions*:
  - Intervention
  - Interference
  - Interplay

*Kooiman, J. (2003). Governing as Governance, Sage Publishers

…which leads to a combination of governance forms

Traditional Governance

Market governance

The mutual aspect is
an agreement on used standards

Network governance

Self governance
(Wikipedia)

Answer:
**It can, but with the richness, that governance
originally implied**

So how does this relate to the known IG frameworks?

First defined by Walker and Donaldson commissioned by the NHS (2004):

•Information Governance is to do with the way organizations 'process' or handle information.

•Information Governance provides a way for employees to deal consistently with the many different rules about how information is handled, including those set out in:

- – The Data Protection Act 1998.
- – The common law duty of confidentiality.
- – The Confidentiality NHS Code of Practice.
- – Etc, etc

National Information Governance Framework	Standards Arbitration Indemnity Regulation		
Local NHS Responsibilities	Accessibility Compliance Transparency Rights	Timeliness Completeness Accuracy Relevance	Integrity Availability Confidentiality Accountability

This framework is used to mitigate the following risks…

- 3 risks common to both paper and electronic records
    - the risk of inappropriate access,
    - the risk of record tempering, and
    - the risk of record loss due to natural catastrophes
- And 2 risks more common to electronic records
    - The Risk of Record Degradation
    - The Risk of Technology Becoming Obsolete

And focuses primarily on….control, control, control

Other use of IG is also associated with compliance and control

- Similar control frameworks for *Privacy*, *confidentiality* and **security** have been set up to cover many (US) laws and regulations, but are also topic of discussion (e.g. Snowden case), since these frameworks are not the ultimate solution

- Frameworks for **E-discovery** (e.g. intellectual property and copyright issues) have shown a large growth in the United States, but turn out to be very costly.

…which leads to the question whether control is the magic word?

We question whether these frameworks will cover the aim of IG…

- With a control focus and denying such vital elements as entrepreneurship, innovation, business development, creativity, improvisation, value creation and experiment IG may devaluate the (information) value

- The aims of current IG are often subjective, which makes it hard to control. For example: a study in Australia* revealed that psychologists often disagree on confidentiality breaches

- Most data breaches are security issues and not privacy or confidentiality issues, such as hacking and theft (e.g. 2012 study*), which is not a topic of Information Governance

- The costs of current IG frameworks may be very high: In surveys, many healthcare providers self-report that they are not in compliance with the Privacy Rule due to costs

•http://www.mcri.edu.au/news/2013/january/psychologists-often-disagree-on-confidentiality-breaches,-study-finds/
•http://www.healthcareitnews.com/news/10-largest-data-breaches-2012-so-far?single-page=true

…and would like to stress the (missed) opportunity of Information Governance

Dominant notice on information as asset
- Legal liabilities
- Risk management & regulatory compliance
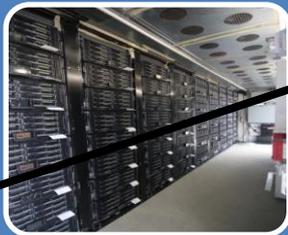
Too technocratic (objectivist)
- Preservation, archiving and storage
- Security, confidentiality and usability of information

Immaterial elements and concepts matter!
- Subjective richness and meaning to users
- Interpretation, sense making & information processes

ROBERT M GRANT, TOWARD A KNOWLEDGE-BASED THEORY OF THE FIRM, *Strategic Management Journal (1986-1998); 7;* pg. 109

…with the following attention points

1. Use alternative governance approaches that may lead to a higher level of trust, since the individual feels more responsibility

2. Be aware of the strong correlation between the definition of the IMP and the behavioral aspects

3. Don't solve subjective observations by imposing 'objective' rules and regulations

4. Pay attention to creator and user: sometimes it is better to create less (privacy) sensitive results, than to impose rules on the user

…then information governance can have many positive implications

Case 1: The supported living case at Arkin

How we used IMP and information governance to stimulate information use

The supported living case at Arkin

- A new methodology for restorative healthcare ('supported living')
- Method in development
- Two years of implementation with the following issues:
  - Hierarchical
  - Low commitment
  - No new development
  - No relation with other methodologies
  - Management had 'control' focus

…there was insufficient support and uniformity in the 'way of working'

Solution: 3 IMP's with network governance and responsibility for the knowledge workers

1. Sensing
2. Collecting
3. Organising
4. Processing
5. Maintaining
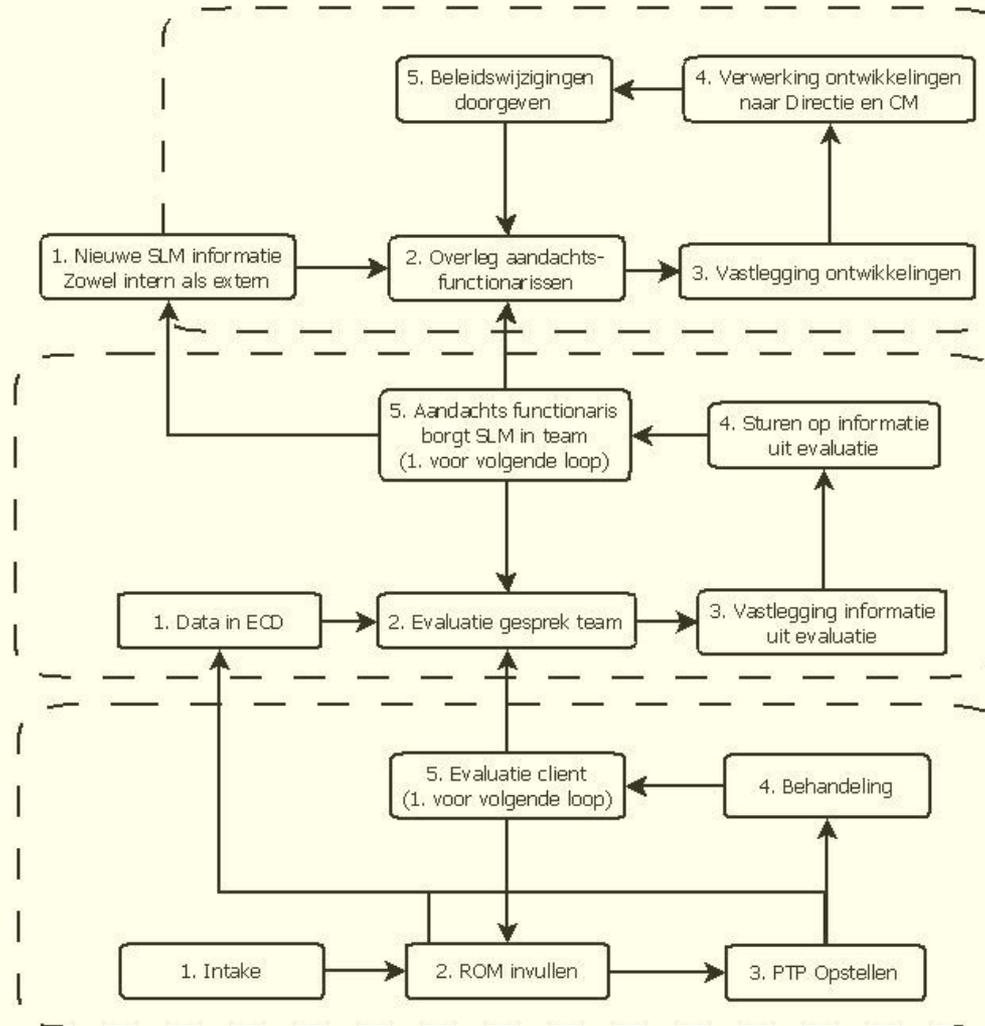
L3: to make decisions and long term strategy

L2: to create knowledge in the teams

L1: to make sense of available information

Case 2: privacy of clients in relation to PHR at Arkin

How we created a higher sense of responsibility in the teams with self and network governance

Privacy in relation to our PHR

- One system for PHR for the whole organization

- Administration and PHR in one system

- Administrative persons had access to PHR's (for reasons of ease and costs)

- Employees had access to PHR's of 1.000 to 10.000 patients

- Functional application management had access to more than 26.000 patients

…absolutely not an acceptable situation

The privacy regulation in Holland required a change…

The decision was to have the system adapted rigorously

- A strict authority scheme - only allowance based on a medical relationship (hierarchical governance, control related)

No organizational change was included, which made it very expensive, because practitioners suddenly had to do much more administrative work

Consequences:

- practitioners gave password to administrative persons. This was not allowed, but due to lack of knowledge and time
- quality of registration went down due to system design, lack of time, and unwillingness to register

…absolutely not an acceptable situation

A more workable solution was found in a combination of governance structures

The strict authority scheme, was kept,…

- But an 'emergency button' was added to offer access for people that normally have no access, e.g. in case of illness or crisis. Access implied a request for motivation (self governance, transparency)
- This access was logged to be able to control the reason for access, including reporting to the Medical director and regular audits (formal process and control)
- Every team member gets an overview of the last 10 visits to the PHR when visiting the PHR (network governance, control, sharing, transparency)
- A PHR board was introduced, that monthly meets, discusses the logging, and improves the design of the PHR (pro-activity, sharing)

Conclusions

- Governance should be applied to both the actors and their interaction to maximize the information value

- There is much more to information *governance*, than the actual frameworks imply

- One should seriously question whether a *control* framework is the sole solution to frame the (mis)use of information