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CER Information Management Strategy

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Executive Summary

The Clean Energy Regulator is an independent statutory authority and has legislative obligations for how it must operate, communicate with clients and manage these interactions. This includes the handling of data and information.

This information management strategy caters for the diversity of business carried out by the Clean Energy Regulator and that Information Management maturity will evolve over time.

The Clean Energy Regulator will only achieve its information management objectives by articulating its requirements for good information management in a framework supported by capabilities that facilitate:

- staff taking responsibility for good information practice
- business processes embedding appropriate information practices, and
- systems configured to deliver information management requirements.

Making it happen

To manage our information effectively the Clean Energy Regulator will have:

- A focus on developing practical capabilities to implement
 - » Records Management
 - » Data Management and Reporting; and
 - » Knowledge Management

The work plan deliverables in this document provide benefits to the Agency that align with the Clean Energy Regulator's end benefits, see the work plan in *Appendix 2*.

The principles for managing information also support broader Clean Energy Regulator objectives such as those articulated in the Enterprise Risk Alignment and the principles in the Client Engagement Strategy.

Introduction

Document Audience

This document is for all Clean Energy Regulator staff.

Document Purpose

The strategy is a living document to provide overarching direction for information management in the Clean Energy Regulator. It details our aspirations and articulates the framework for the development of necessary policies, processes and capabilities. It will be revisited at least every 3 years.

Coverage

This strategy encompasses all Clean Energy Regulator Information. That is: all electronic data, media, files and physical records, collected on our technology infrastructure or created by our systems and information created or collected by our staff in the performance of their duties.

Where Does the Information Management Strategy Fit In?



The Clean Energy Regulator must cease paper record-keeping and move to digital as required under the National Archive of Australia's Digital Transition Plan.

Current state - 2014	Transition state - 2015	Future state - 2016
Paper-based record-keeping	Transition to Digital record-keeping	Digital record-keeping
Remote EDRMS managing paper records	EDRMS to be implemented	EDRMS operational
Reliance on G: Drive holdings	Valuable and vital documents to be moved to EDRMS with G: drive contents made read-only	G: Drive archived
Reliance on printed documents	Digital documents including scanned images	Digital documents including scanned OCR holdings
Disparate data holdings	Documents held digitally in several business systems including EDRMS	Integration of authorised business systems with EDRMS
Expanded use of paper	No impact on use of paper	Paper use is appreciably reduced

Large holdings of registry files	Large holdings of registry files	No further creation of registry files
No real use of Metadata	Metadata beginning to be used	Confident use of Metadata
Multi-Function devices can only scan images	Multi-Function devices can only scan images	Multi-Function devices can scan documents using OCR

Good Information Management is our Core Business

Decision Making

Our ability to identify, analyse and prioritise regulatory risk, make well informed, reliable and consistent decisions and provide assurance to stakeholders that regulatory objectives are met, is dependent on the quality of the information available to managers and regulatory decision makers. Decisions made by the Agency may be subject to review and external scrutiny. In this context it is important that decisions are documented and the evidence used to support those decisions is available and stored in accordance with good Government record keeping practice.

Providing Information

We are a provider of information. To be successful we need to provide accurate and consistent information to assist clients make informed decisions about regulatory obligations. We also have a responsibility to support the effective operation of markets through the provision of timely and reliable market information.

Custodian of Data and Distributor of Policy Information

Approximately 80% of Australian energy data used by the Commonwealth Government is collected and managed by the Clean Energy Regulator. The National Greenhouse Energy Reporting information supplied by Australian industry and compiled by us is an important data contributor to support Australian energy research, discussion and decision making among Australian governments and the community. We need to ensure that we effectively capture, store and appropriately distribute data and provide policy-making information according to legislative requirements.

Compliance

We have a range of compliance and enforcement obligations in particular to ensure that we're collecting the right amount of revenue and that instances of fraud are appropriately dealt with. These functions must be supported by intelligence analysis and intelligence products. Intelligence work relies on access to information and data stores and the ability to search and compare information from different sources. We

also need to implement information management processes which support the preparation of successful legal cases.

Security

We have a legislative obligation to protect the information we collect and to strictly control the release of information. We need to establish and enforce consistent procedures to manage the release of information classified as protected under the Clean Energy Act.

Management Information

Sound information management is central to effective and accountable regulator administration. We need to collect and report performance information to enable it to effectively manage and review business processes and the quality of outputs.

Managing the Information Asset

As with people and finances information is an important asset to the Clean Energy Regulator. *We need a framework for the management and maintenance of this asset.*

Knowledge

Many Commonwealth agencies have struggled to implement knowledge management frameworks. The Clean Energy Regulator has an opportunity to manage its information to support the continuous development of effective business processes. Supported by appropriate ICT toolsets we are in a position to establish cross agency collaboration and information sharing processes, develop information sets around improving quality outcomes from business processes and provide an opportunity to document and share experience to create a best practice knowledge base.

Information and knowledge management will allow us to:

- Deliver a holistic, strategic approach that assists us to make well informed, timely and evidenced based decisions.
- Facilitate information access and sharing across the Agency to ensure a reduction of the risk of working in silos and disconnected engagement with clients.
- Enable the use of information to understand our client's behaviour, plan, forecast and predict non-compliance.
- Respond to client expectations for simple, modern and easy information and services so that clients can fulfil their expectations.
- Understand the information that it needs to collect. Meet Australian Government requirements for records management.
- Coordinate business areas and run them efficiently, leveraging the information asset.

Strategic Principles for Information Management

The Strategic Information Management Principles prescribe the way information will be collected, protected, stored and used in the Agency.

- **Information is obtained from a single authoritative source** – to support robust decisions, minimise regulatory burden and enable consistent interpretation. Information will be collected once and screened / validated / checked to meet quality standards.
- **Information is governed and owned** – all information is governed and has clearly assigned ownership.
- **Information is managed according to business value** – information that has legal obligations is treated with priority.
- **Users of information are skilled and responsible** – ensure that internal and external users of information are supported to help them understand and use information responsibly.
- **Information collected is on a need only basis** – ensure collection process does not have surplus, irrelevant or inaccurate information, in order to minimise regulatory burden.
- **Information management practices are embedded in the organisation** – business processes reflect good information management practice and reduce duplication and re- work for staff.
- **Information is treated as a shared asset** - staff are aware that the information they collect, create or manage will be available to other users.

These Strategic Information Management Principles are complementary to the Engagement Principles in the Client Engagement Strategy and the advice in the Good Decision Making Guide.

Information Life Cycle Management

The effective management of information throughout its useful life should be governed by Information Life Cycle Management. Policies and procedures that reflect the Information Life Cycle will operationalise the day to day processes and actions necessary to manage and realise the strategic value from CER's information. Records management practices will operationalise this cycle.

Information life cycle management



Plan – what data is needed and how will it be used across CER for business and client purposes?

Create and collect – does the information needed exist, how is it collected or acquired, what new data is being created?

Evaluation – how will the CER screen, check or validate the data at the source and before it is accepted?

Organise and Store – what level of technology is required to store, secure and provide access to the information and how will the information be defined and classified.

Analyse – the Business Intelligence section provides the CER with capabilities to analyse the data. There may be additional analysis requirements identified where this capability may need to be expanded.

Use and Disseminate – how will the information be used across CER for business, client, community and government purposes? Will appropriate audiences be able to easily access the information they need in a usable format?

Review – what are the processes or strategies in place to review the rules for information management?

Maintain and Protect – what standards, procedures and policies are being used to maintain and protect the information as a CER resource and asset?

Dispose – Information disposal is governed by scheme legislation and government legislation which includes the Privacy Act and the Archives Act. How does this apply to the information?

Capabilities We Need to Provide for Effective Information Management

We will only achieve its information management objectives by articulating its requirements in an information management framework that facilitates:

- staff taking responsibility for good information practice
- business processes embedding appropriate information practices, and

- systems configured to deliver information management requirements.

Develop capability through a focus on:

1. Records Management

- Governance – agency wide records management co-ordinated from one source.
- Policies, business classification schema, records disposal authorities.
- Electronic document and records management.

2. Data Management and Reporting

- Governance – business custodians.
- Policies and procedures.
- Reporting tools and data warehousing.

3. Knowledge

- Train staff on information management practice.
- Deliver metrics to better understand our business.
- Establish better practice knowledge bases.
- Provide collaboration tools and facilitate information discovery.

Appendix 1

Requirements and Responsibilities Surrounding Information Management

Scheme and Legislative Requirements

The Clean Energy Regulator was established on 2 April 2012 to administer the regulatory functions. Clients may need to transact with several of the Regulator's schemes. Therefore our information management needs to support a single view of client. There are also records management requirements and security requirements, both legislative and internal which drive the need for information management.

Client and Stakeholder Requirements

Our information management platform will need to cater for the following client and stakeholder requirements:

- Government service delivery information for each of the CER schemes is expected to be transparent, high quality and proactively available and in a usable format, and
- Our stakeholders expect easy access to information through multiple channels. Further guidance on meeting client needs and expectations is defined in the Client Engagement Strategy.

Intelligence Analysis Requirements

We have a range of compliance and enforcement obligations which must be supported by intelligence analysis and intelligence products. Intelligence work relies on access to information and data stores and the ability to search, collate and customise reports. These reports will sometimes focus on single entities or outliers. Other intelligence analysis products will be wider in scope and will be used to create a broad, informed picture of our clients and regulated community.

The ATO, ACC, ASIC and ACCC are regulatory agencies that we have agreements in place with to share information. These agencies will also rely on the integrity and timeliness of our information. Building and maintaining a reputation as trusted providers of quality information is the responsibility of all Clean Energy Regulator employees.

The Enterprise Data Warehouse is of critical importance for consistent information capture across the Clean Energy Regulator and meeting the objective of harnessing all our information whether for internal or external intelligence purposes or scheme purposes.

Security Requirements

Client personal and compliance information needs to be secured in accordance with legislative and Australian Government obligations. Our information systems must meet obligations with respect to the Commonwealth security requirements as stated in the *Protective Security Policy Framework* and the *Information Security Manual*, and legislative requirements as stated in the *Clean Energy Regulator Act 2011* and climate change law, the *Crimes Act* and the *Privacy Act*.

In addition, IT security must be consistent across our work programs and must comply with the ICT Security Policy.

Information Consolidation

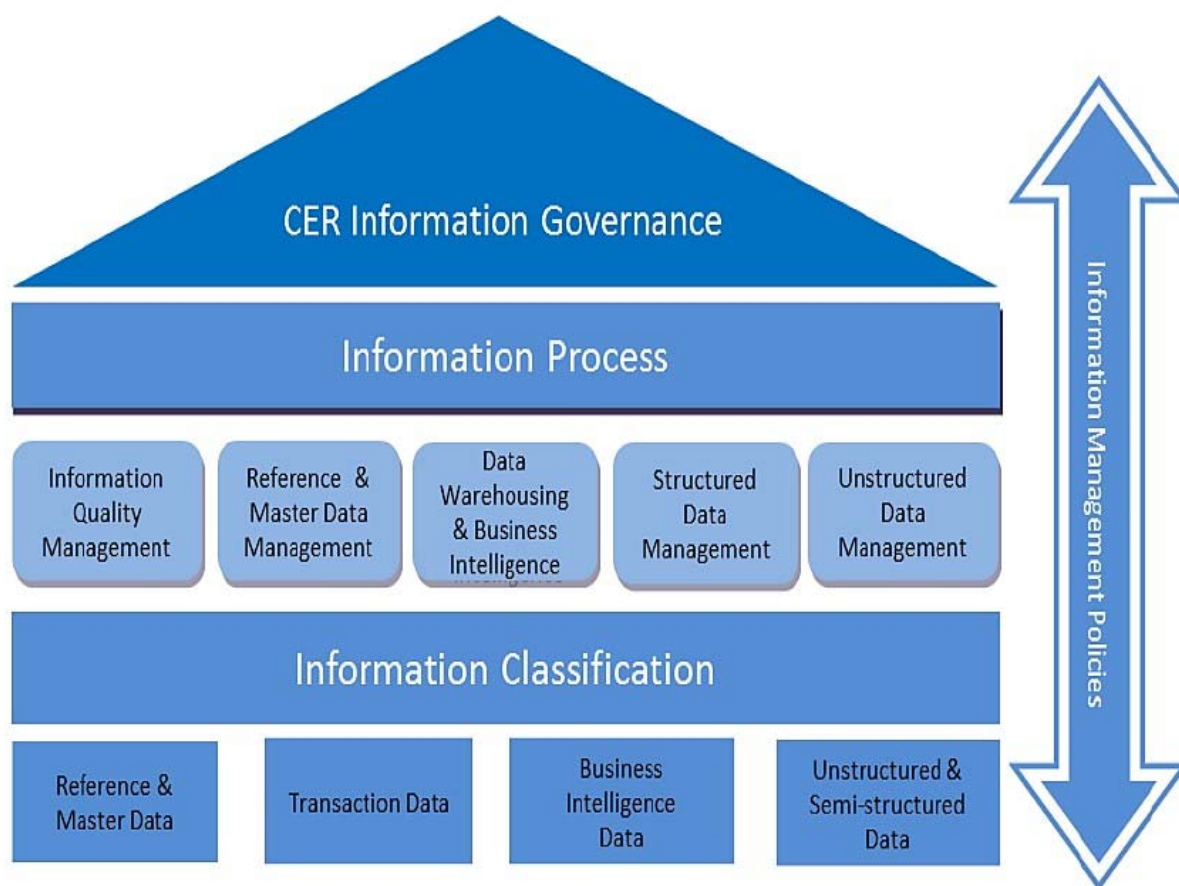
A large number of existing and non-integrated systems were acquired from our schemes when they were brought together under the establishment of the Clean Energy Regulator. Our Enterprise Data Model will be a critical step to enable us to progress from using disparate information systems and manual reporting processes to systems that support our business objectives from a holistic perspective.

Efficiency through use of Technology

Technology enables us to process, manage and provide access to large volumes of information efficiently. In the Clean Energy Regulator the technology systems are used primarily for managing either records or knowledge.

As technology solutions require a substantial lead time to be defined and built a variety of spread sheets and word documents stored on the G:drive have been used as interim solutions. These will be phased out as fit for purpose technology that is part of the enterprise architecture is developed.

Our technology investment in information management systems will be supported by business training initiatives to ensure that business areas make effective use of the technology systems and applications.



Records Management Requirements

As an Australian Government agency the Clean Energy Regulator is obliged to have in place a record keeping system that manages information according to legislative, evidentiary and accountability requirements. These include:

- Freedom of information Act 1982
- Archives Act 1983
- Privacy Act 1988
- Crimes Act 1914
- Public Governance, Performance and Accountability Act 2013
- Public Service Act 1999

Standards

- Australian Records Management Standard ISO 15489
- National Archives of Australia

- The Australian National Audit Office
- National Government Information Sharing Strategy

Creating, capturing and managing information records are important for meeting statutory recordkeeping requirements. We need to fully document key strategic, operational and regulatory decisions to provide a record of evidence, analysis and judgement. Well documented decisions:

- improve accountability
- increase transparency of the decision rationale
- provide evidence in appeals and reviews of decisions by meeting requirements for records of the process that led to the decision, and
- in time, develop consistency of decision-making in an organisation.

Obligations are also placed on the regulated community and there is an expectation that we will handle our information in a manner which reduces regulatory burden and supports clients and external stakeholders to meet their obligations.

Record keeping services for our paper-based registry files are currently leveraged from the Department of Environment. The EDRMS to be completed in May 2015 will provide all record keeping services.

The EDRMS will be the source of all our official records.

Appendix 2

Work Plan

Information management requires a large step change and a long term commitment. This draft work plan outlines an organised approach to assist in maturing our information management framework.

Short Term Work Plan (0-6 months)

Item	Details
Strategic Priorities	<ul style="list-style-type: none"> • Records Manager to be accountable for a CER Records Authority.

Records Management	<ul style="list-style-type: none"> • Undertake a records management Agency self-assessment check-up. • Records and Information Management Policies. • CER Business Classification Scheme. • EDRMS pilot and releases.
Data management and reporting	<ul style="list-style-type: none"> • CER Metadata Standards. • Data Reference Model. • Enterprise Data Model and Policy • Data Management Processes.
Knowledge	<ul style="list-style-type: none"> • Migrate existing collaboration sites and rollout further sites. • Improve Intranet knowledge base and information sharing capabilities. • Deliver information discovery tools – improved high end search function. <p>Establish KPIs for EDRMS business processes and deliver reports.</p>

Medium Term (6-12 months) Work Plan

Item	Details
Strategic Priorities	Review information management policies.
Records Management	<ul style="list-style-type: none"> • Completed phase one rollout of EDRMS • Ongoing RM training plan. • Business Area Training Package. • Review legacy and continuing paper file requirements.
Knowledge management	<ul style="list-style-type: none"> • Deliver CER better practice knowledge bases.

Long Term (12 months and beyond) Work Plan

Item	Details
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Strategic Priorities	<ul style="list-style-type: none"> • Review operation of information management in CER • Review operation of data and reporting MoU's and sharing arrangements. <p>Review effectiveness of data warehouse and reporting.</p>
Records Management	<ul style="list-style-type: none"> • Potential project to scan legacy information into EDRMS • Further automation of electronic records management metadata tagging.
Knowledge	<ul style="list-style-type: none"> • Review requirements for sharing and recording of CER business information • Tools to support

Appendix 3

Information Quality and Assurance

Embedding good information management practice in business processes requires a minimum set of standards that apply to all our information to make certain that our strategic goals and benefits are met.

To ensure that information management practice positions us for success we will judge the quality of information by using the following information attributes:

Information attributes	Implementation activities to cultivate attribute	Benefits	Link to CER
Discoverable	Information must be classified, stored and maintained in a manner that makes it easily accessible and discoverable based on the role of the person seeking it.	<ul style="list-style-type: none"> • Information is shared across the organisation • Avoids information silos. 	<ul style="list-style-type: none"> • Effective Operations. • Efficient Operations.

Information attributes	Implementation activities to cultivate attribute	Benefits	Link to CER
Secure legal and private	The CER receives, handles, stores and sends sensitive information which requires protection and needs to be secured by technical and non-technical measures in accordance with legislative requirements and information classification standards.	<ul style="list-style-type: none"> • CER responsibility to manage information is consistent with legal and ethical obligations are met. • Information provided to others is secure, accurate, legal and appropriate 	<ul style="list-style-type: none"> • Effective Operations. • Efficient Operations.
Accurate, consistent and reliable	Processes to validate data must be undertaken early. If information is being collected from clients or a third party processes should be in place to detect and correct errors as early as possible.	<ul style="list-style-type: none"> • Minimises data integrity issues. • Validating information at the source as it is collected saves time and effort. 	<ul style="list-style-type: none"> • Effective Operations. • Efficient Operations. • Acceptable Regulatory Burden. • Engaged and Compliant Participants.
Gathered once, used many times	Information holdings support evidence based decisions. This includes the rationale underpinning the decision and the evidence supporting the decision.	<ul style="list-style-type: none"> • Reduces regulatory burden. 	<ul style="list-style-type: none"> • Effective Operations. • Acceptable Regulatory Burden.
Decision maker needs are met	Information holdings support evidence based decisions. This includes the rationale underpinning the decision and the evidence supporting the decision.	<ul style="list-style-type: none"> • Satisfies regulator transparency and audit trail requirements. 	<ul style="list-style-type: none"> • Effective Operations. • Consistent Regulatory Posture.

Information attributes	Implementation activities to cultivate attribute	Benefits	Link to CER
Core business practices are designed in-line with information management principles	Processes, procedures and systems for managing information take on a whole of CER relevance.	<ul style="list-style-type: none"> All CER staff are involved with maintaining information management practices in their daily work. 	<ul style="list-style-type: none"> Effective Operations.
Fit for Purpose	The right information is collected, classified and stored.	<ul style="list-style-type: none"> Information is easily identified and decisions can be made in a timely way. 	<ul style="list-style-type: none"> Effective Operations. Acceptable Regulatory Burden. Consistent Regulatory Posture.

Related policies and references

Policies

- CER Information Management Policy
- CER NAP Guidelines

Consultation

Internal stakeholders:	
External stakeholders:	

Endorsement

Endorsed on:	04.05.15
By:	Chief Operations Officer
Signature:	

Approval

Approved on:	
By:	
Signature:	
Period of effect:	
Review date:	01.07.15

Version control

Version	Date	Author	Approver
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3.0	04/05/2015	J Manley; Z. Faulkner; Andrew Hidayat; Garry Wyatt; Alex Hilson	Endorsed by Chief Operations Officer
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