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**INFORMATION GOVERNANCE POLICY FOR**

**TRANSPORT FOR LONDON(TfL)**

# **Introduction**

* 1. According to the Greater London Authority Act of 1999, Transport for London (TfL) was founded in 2000 as a division of its parent organization (I.e., Greater London Authority). TfL oversees the majority of London's electronic transportation system in the United Kingdom.
  2. TfL obtains a substantial amount of data from individuals and third-party vendors daily. Personal information and payment card data are provided by an individual. Information governance is of utmost importance when it comes to good customer service and the organization's reputation.
  3. TfL will abide by the guidelines outlined in Section 144 of the Transport Act (1968) as revised by the Greater London Authority Act (1999), the Railway Heritage Act (1996), and the Data Protection Act (2018).

# **Purpose of the Policy for TfL**

* 1. Through this policy, the purpose is to specify a framework that guarantees Transport for London (TfL) has systems and procedures in place to manage data, utilize data, and show how important it is for TfL to protect its data. It also establishes systems and best practices for managing data followed by the employees.

# **Scope for TfL**

* 1. This policy applies to TfL and any businesses or service providers (such as consulting firms or agencies) hired by TfL.

# **Objectives of the Policy**

The information governance policy's goals must include the following to support and fulfill the purpose of the policy:

* 1. The information security policy, information access policy, and privacy and data protection policy must all be followed when managing any information which TfL retains.
  2. Guidelines to be placed for identifying data with long-term worth and using historical archives as a business resource.
  3. IACT will organize training and provide ad hoc guidance on the correct handling of information and records as needed.
  4. There are methods, systems, and organizational frameworks in place to manage all information access requests in accordance with applicable laws.
  5. Information risk is considered and given priority in decisions within TfL, much as financial and operational risk. Corporate and regional risk registries will reflect this. The Methodology for assessing Information risk will constitute of detecting, managing, limiting, and eliminating risks/threats that might impact TfL's data retained or information systems.
  6. The development and maintenance of Records via their selection and long-term preservation will all fall within the compass of Information Governance, Corporate resources such as using Archives as a means of encouragement/promotion. This includes all formats of Archives, including digital archives.
  7. In accordance with all applicable laws, regulations, environmental standards, and all other TfL policies, standards, and processes, manage our data and asset knowledge.
  8. Establishing, monitoring, and managing performance through asset management goals helps to assess the system's performance and make it more efficient.
  9. To effectively develop and deploy an asset management system that complies with ISO 55001, ensure that there are sufficient resources available.

# **Policy Framework**

TfL will:

* 1. Upholding the six data protection principles and complying with data protection legislation.
  2. Maintained by TfL’s information governance team to comply with TfL's Information Security Policy, personal data must be managed.
  3. Risk Management: The risk management strategy of Transport for London aims to actively manage every risk to improve the organization's capacity to achieve its goals. The business framework will integrate risk management so that frequent risk evaluations may be undertaken to identify and manage risks effectively.
  4. Information and Records Management: To support the operational readiness of the organization, to comply with the regulatory environment, and to offer appropriate accountability, authentic, trustworthy, and usable records are protected. As per the assessment of the viability of the information that is in the records, must be preserved only until it is required and then accordingly disposed of.
  5. Information Access: To manage all information access requests in accordance with the relevant laws, there are structures, systems, and procedures in place.
  6. Privacy and Data Protection: Provide security exposures at the time the individual’s information is gathered from the clients, with access to any additional secondary data available through the TfL’s site. Transparency must be maintained about how individual information is handled. Review and respond to inquiries from individuals who need their own information rectified or erased, as well as solicitations from individuals who need to confine the handling of their own information.
  7. Roles and Responsibilities: The information governance committee must provide the Data Protection Officers (DPO) with the opportunity, tools, and assistance in matters relating to the protection of data, according to the regulations. Specify the tasks for the company and its employees for guidance on their responsibility to comply with data protection laws.

# **Related Policies and Procedures**

* 1. Comply with any remaining applicable legitimate necessities which apply to its handling of an Individual’s Information, including:
     1. The Human Rights Act (1998) mandates compliance with the European Union (EU) on Human Rights and Fundamental Freedoms' right to respect private and family life.
     2. The Privacy and Electronic Communications (EC Directive) Regulations 2003
     3. Lord Chancellor’s Code of Practice on Records Management
     4. Legal admissibility and evidentiary weight of electronically stored information: BSI 10008:2008.
     5. The Police and Other Statutory Law Enforcement Agencies: TfL's Policy on the Disclosure of Personal Data.
     6. International Standard on Records Management, ISO 15489:2001
     7. Information and Records Management Policy (TfL).
     8. Information Access Policy (TfL).
     9. Information Security Policy (TfL).
     10. Code of Conduct (TfL).

# **Monitoring, Measurement, and Review Mechanisms**

* 1. All corporate policies will be evaluated quarterly and monitored by information governance due to the large database. The risk associated with any new threats will be evaluated, and as a result, the company's policies and processes will be improvised to remediate any risk.
  2. Information Governance is responsible for communicating with the investigating authority, compiling any relevant data, and drafting TfL's formal response if a complaint is made about the way TfL handled a request for access to or re-use of information. This complaint may eventually be escalated to an external regulator (either the Information Commissioner or OPSI).

# **Compliance**

* 1. Follow the guidelines and standards outlined in the following documents to demonstrate compliance with the following data protection laws:
* Regulations from the European Data Protection Board on observing GDPR (General Data Protection Regulation).
* Ethical Practices and guidance publications from the Information Commissioner.
* Payment Card Industry Data Security Standard (PCI-DSS) regarding an individual’s credit card information.

# **Approval**

* 1. This policy's revised version number and approval date are shown on the title page.

**INFORMATION GOVERNANCE POLICY REPORT FOR TRANSPORT FOR LONDON(TfL)**

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List of Abbreviations

IG – Information Governance

TfL – Transport for London

GDPR – General Data Protection Regulation

CTO – Chief Technology Officer

IGPMM - Information Governance Process Maturity Model

FOI – Freedom of Information

ISO – International Organization of Standardization

GLAA - Greater London Authority Act

DPA - Data Protection Act

IACT – Impact Assessment of Cybersecurity Threats

DPO – Data Protection Officers

PCI DSS – Payment Card Industry Data Security Standard

RIM – Records Information Management

CGOC: Compliance, Governance, and Oversight Council

1. Forward – Background to the Company and the Policy context

The public governmental agency in Greater London, United Kingdom, known as Transport for London (TfL), oversees the majority of the transportation system's operations. Its obligations include managing London's transportation services and satisfying its customers. The Mayor of London, Sadiq Khan, appointed the board members that run TfL. The Board is the organization's top management body, which is headed by the Commissioner of Transport for London. To manage and secure access to and usage of personal information related to public engagement and consultation activities, numerous policies, procedures, and technological safeguards are in operation.

TfL intends to implement an information governance framework to satisfy these demands. This approach reduces risk, enhances security, and establishes a culture of information security. The organization’s risks and threats, its structures, settings, and processes must be assessed, constantly reviewed, and addressed as necessary.

Both information and the organization's requirements are constantly changing. Information governance must therefore keep evolving to meet the demands of TfL. The organization will change and develop, and information governance will continue to add value. Though many organizations cannot manage properly, any organization can thrive by adopting a different outlook and proactively integrating data governance with all aspects of how it operates on a day-to-day basis.

1. Executive Summary
   1. Introduction

This report and policy will explore TfL's response to the need for an information governance (IG) policy and show how the organization's IG policy satisfies both organizational business requirements and General Data Protection Regulation (GDPR) requirements.

* 1. Report’s Structure

The report's introduction provides background information on TfL's history as well as the rationale for implementing an information governance policy. The essential elements of information governance are then discussed. Then, the policy items are examined to see how they relate to the organization, with any necessary references to the fundamental principles, vital regulations, and applicable laws.

Finally, the recommendations required to implement the policy are outlined, along with timetables and projected costs.

* 1. Why should TfL implement an Information Governance policy?

Information governance is crucial for TfL to implement.

* + - In accordance with the requirements of the General Data Protection Regulation, May,2018 (GDPR). TfL must implement this policy to protect its assets and the individual’s personal data. The systems must be in place for business continuity in case of a breach.
    - In 2019, TfL faced a minor data breach due to credential surfing. As a result, 1200 accounts were breached as reported by ‘the Registry’ but no payment details data was stolen. The CTO ‘Sashi Verma’ makes a statement regarding the incident ensuring that the customers’ personal data and customer service is paramount to the organization. As a precaution, 6 million accounts were locked out from accessing their data on the website and were recommended to change the password according to the policy requirements.
    - Datta (2019) asserts that there are numerous business requirements that must be managed through information governance, particularly those organizations that relate to data and information that drive its operations. In this digital era, Information Governance is more of a need than a luxury for many organizations.
    - Information governance is necessary due to serious concerns over the security and privacy of personal data.
    - Data protection, more productivity, more efficient data management, cheaper costs, improved customer service, and worker convenience are all advantages of information governance for TfL.
    - Information governance helps implement policies essential to making information management a success.

1. About Information Governance: What Are the Objectives?

How information would be used is referred to as "information governance" (IG). It covers all facets of systems and process management, records management, data quality, privacy, and the safeguards necessary to ensure that information sharing is secure, private, and tailored to the needs of businesses and the requirements of customers. The General Data Protection Regulation (GDPR) of the U.K., the Data Protection Act of 2018, and sections of the international standard for information security management systems ISO27001 direct organizations to follow the Information Governance Principles, which offer a set of key guidelines or frameworks.

The core tenet of the CGOC's information governance maturity model is that as information matures, its value declines, the cost of preserving it remains constant (rising as data volume increases), and the price of e-discovery and legal risks increases dramatically. The development of 22 processes that help identify and improve the management of information value, cost, and risk is necessary for improving the information economy. The procedures consider the requirements of valuable information stakeholders, such as IT, business units, privacy and security, records information management (RIM), and legal. Every company or organization goes through four stages of process maturation:

Stage 1: Ad hoc and inconsistent

IT "keeps everything," as there is simply no systematic mechanism to identify regulatory responsibilities or economic value.

Stage 2: Siloed and manual

the most immature, IT “keeps everything” because there is simply no systematic way to determine regulatory obligations or business value.

Stage 3: Siloed, consistent, and instrumented

Systems can be manually configured by IT to keep, hold, gather, or delete data. Certain programs allow manual configuration of legal requirements.

Stage 4: Integrated, instrumented, and optimized

When no lawful restriction has been indicated, data is automatically erased at the end of its retention term, and backup data is regularly and methodically overwritten.

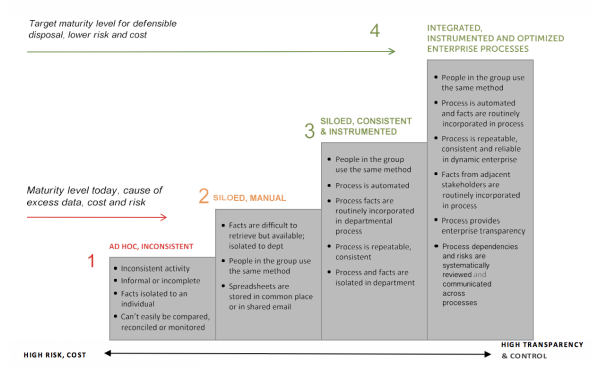


Figure 1: Information Governance Process Maturity Model

Among the requirements of the information governance policy that ensures a competent resolution to a possible data breach are a security framework with information governance program-aligned rules and procedures, safeguarding personal data, and fostering a privacy culture through education and ongoing testing to ensure the execution of relevant breach notification, cyber incident response, and business continuity planning legislation, as well as reporting cyber incidents appropriately both internally and to external regulators.training for all personnel who may be affected, including IT, data protection, and legal staff, to enable them to respond responsibly and rapidly in the case of a data breach.

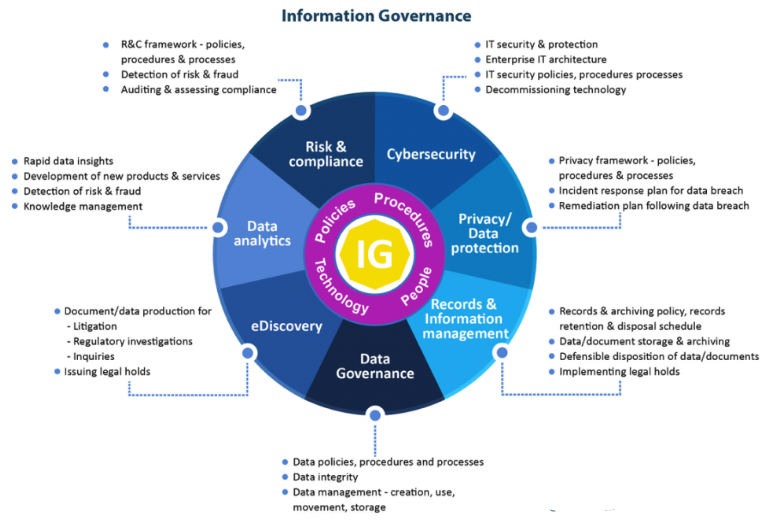


Figure 2: Items of Information Governance Policy (IG)

1. **Analysis of the policy elements**

*Introduction*

Policy 1.1: “According to the Greater London Authority Act of 1999, Transport for London (TfL) was established in 2000 as a division of its parent organization, the Greater London Authority. TfL oversees the majority of London's electronic transportation system in the United Kingdom.”

Analysis of 1.1: The fragmented patchwork of services that Transport for London has been gradually inheriting since 2000 has been transformed into an integrated transport authority, and this has been successful. To provide end-to-end services, several public transportation modalities were merged under the recognizable TfL brand. Unlike other transport agencies, TfL also oversees the city's major thoroughfares and streets, which includes managing cycling, taxi and minicab regulation, traffic signaling, and congestion pricing. The mayor's ability to advocate for the transportation agenda and win political and financial backing is crucial to TfL's success. The Mayor of London serves as the TfL board's chair and spends £11 billion annually, or two-thirds of his yearly budget, on transportation.

Policy 1.2: “TfL obtains a substantial amount of data from individuals and third-party vendors daily. Personal information and payment card data are provided by an individual. Information governance is of utmost importance when it comes to good customer service and the reputation of the organization.”

Analysis of 1.2: On a daily basis, TfL obtains personal information and payment details from the customers, and the TfL’s website requires some digital information like geolocation, login details, and acceptance of cookies from the individuals accessing the TfL website. The information for all the customers must be safely stored and managed by the systems and policies. Having an information governance policy in place can help TfL cater to customer service needs and boost its reputation.

Policy 1.3: “TfL will abide by the guidelines outlined in Section 144 of the Transport Act (1968) as revised by the Greater London Authority Act (1999), the Railway Heritage Act (1996), and the Data Protection Act (2018).”

Analysis of 1.3: Here, TfL must follow the guidelines given by certain organizations for information governance as being important to the organization, its clients, and the future of the organization for its smooth running and protection of information.

*Purpose*

Policy 2.1: “Through this policy, the purpose is to provide a framework that guarantees Transport for London (TfL) has systems and procedures in place to manage data, utilize data, and show how important it is for TfL to protect its data. It also establishes roles and responsibilities for managing data.”

Analysis of 2.1: Here, TfL defines the purpose of information governance policy, its framework, procedures, and relationship with data.

*Scope*

Policy 3.1: “This policy is applicable to TfL as well as any businesses or service providers (such as consulting firms or agencies) hired by TfL.”

Analysis of 3.1: Here the scope of the policy would ideally apply to all corporate operations, but an information governance policy can only be put into practice for data that belongs to the organization.

*Objectives*

Policy 4.1: “The information governance policy's goals must include the following to support and fulfill the purpose of the policy:

1. The information security policy, information access policy, and privacy and data protection policy must all be followed when managing any information which TfL retains.
2. Guidelines for identifying data with long-term worth and using historical archives as a business resource.
3. IACT will organize training and provide ad hoc guidance on the correct handling of information and records as needed.
4. There are methods, systems, and organizational frameworks in place to manage all information access requests in accordance with applicable laws.
5. Information risk is considered and given priority in decisions within TfL, much as financial and operational risk. Corporate and regional risk registries will reflect this. The Methodology for assessing Information risk will constitute of detecting, managing, limiting, and eliminating risks/threats that might impact TfL's data retained or information systems.
6. The development and maintenance of Records via their selection and long-term preservation will all fall within the compass of Information Governance, Corporate resources such as using Archives as a means in encouraged/promoted. This includes all formats of Archives, including digital archives.
7. In accordance with all applicable laws, regulations, environmental standards, and all other TfL policies, standards, and processes, manage the information and asset knowledge.
8. Establishing, monitoring, and managing performance through asset management goals helps us assess our system's performance and make it more efficient.
9. To effectively develop and deploy an asset management system that complies with ISO 55001, ensure that there are sufficient resources available.”

Analysis of 4.1:

The goals and objectives of the information governance policy are detailed in:

* 1. TfL follows information security, information access, and privacy and data protection policies to safeguard the information.
  2. Identifying the worth of the data.
  3. Training and guidance for the employees to handle the information and records.
  4. Information access requests by the customers are to be dealt with by the applicable laws.
  5. Assessing the risks according to various situations in the organization.
  6. Maintaining and developing the records.
  7. Following laws, regulations, environmental standards, policies, and processes to manage Data and asset knowledge.
  8. Asset management goals are assessed to make performance more efficient.
  9. Using ISO 55001 to develop an asset management system for the organization.

*Framework*

Policy 5.1: “Upholding the six data protection principles and complying with data protection legislation.”

Analysis of 5.1: The six data protection principles constitute “transparency, purpose limitation, accuracy, data minimization, storage limitation, and integrity and confidentiality.” The organization follows regulations set by the General Data Protection Regulation.

Policy 5.2: “Maintained by TfL’s information governance team to comply with TfL's Information Security Policy, personal data must be managed.”

Analysis of 5.2: The information governance team committee is set up to maintain the information security policy and encourage the employees to follow the policies to manage the personal data of the customers.

Policy 5.3: “Risk Management: The risk management strategy of Transport for London aims to actively manage every risk to improve the organization's capacity to achieve its goals. The business framework will integrate risk management so that frequent risk evaluations may be undertaken to identify and manage risks effectively”

Analysis of 5.3: Risk management is integrated to identify and manage these risks.

Policy 5.4: “Information and Records Management: To support the operational readiness of the organization, to comply with the regulatory environment, and to offer appropriate accountability, authentic, trustworthy, and usable records are protected. As per the assessment of the viability of the information that is in the records, they are preserved only until it is required and then accordingly disposed of.”

Analysis of 5.4: Information and Records Management used by the organization for using the data appropriately until its expiration.

Policy 5.5: “Information and Records Access: To manage all information access requests in accordance with the relevant laws, there are structures, systems, and procedures in place.”

Analysis of 5.5: This section will help the employees to process the requests regarding their information according to the law and regulations.

Policy 5.6: “Privacy and Data Protection: Provide security exposures at the time the individual’s information is gathered from the clients, with access to any additional secondary data available through the TfL’s site. Transparency must be maintained about how individual information is handled. Review and respond to inquiries from individuals who need their own information rectified or erased, as well as solicitations from individuals who need to confine the handling of their own information.”

Analysis of 5.6: Privacy and data protection for the customers’ personal data. How it is acquired, stored, handled by the employees, and erased.

Policy 5.7: “Roles and Responsibilities: The information governance committee must provide the Data Protection Officers (DPO) with the opportunity, tools, and assistance in matters relating to the protection of data according to the regulations. Specify the tasks for the company and its employees for guidance on their responsibility to comply with data protection law.”

Analysis of 5.7: The information governance committee must follow the regulations and laws and provide the TfL employees with the required tools and assistance to abide by the policy.

*Related Policies and Procedures*

Policy 6.1: “Comply with any remaining applicable legitimate necessities which apply to its handling of an Individual’s Information, including:

* 1. The Human Rights Act (1998) mandates compliance with the European Union (EU) on Human Rights and Fundamental Freedoms' right to respect private and family life.
  2. The Privacy and Electronic Communications (EC Directive) Regulations 2003
  3. Lord Chancellor’s Code of Practice on Records Management
  4. International Standard on Records Management, ISO15489:2001.
  5. Legal admissibility and evidentiary weight of electronically stored information: BSI 10008:2008.
  6. The Police and Other Statutory Law Enforcement Agencies: TfL's Policy on the Disclosure of Personal Data.
  7. Information and Records Management Policy (TfL).
  8. Information Access Policy (TfL).
  9. Information Security Policy (TfL).
  10. Code of Conduct (TfL).”

Analysis of 6.1: The list above shows all the policies, laws, and regulations that must be followed by the organization according to the business’s needs, and access and management of the individual’s data.

*Monitoring, reviewing and measuring mechanisms*

Policy 7.1: “All corporate policies will be evaluated quarterly and monitored by information governance due to the large database. The risk associated with any new threats will be evaluated, and as a result, the company's policies and processes will be revised to remediate any risk.”

Analysis of 7.1: The policies and procedures are regularly updated after a review according to the needs of TfL.

Policy 7.2: “Information Governance is responsible for communicating with the investigating authority, compiling any relevant data, and drafting TfL's formal response if a complaint is made about the way TfL handled a request for access to or re-use of information. This complaint may eventually be escalated to an external regulator (either the Information Commissioner or OPSI).”

Analysis of 7.2: Monitoring of complaints that could cause any issue in the system must be handled by the investigating team.

*IG Policy – Compliance*

Policy 8.1: “Follow the guidelines and standards outlined in the following documents to demonstrate compliance with the following data protection laws:

Regulations from the European Data Protection Board on observing GDPR

Ethical Practices and Guidance Publications from the Information Commissioner.

Payment Card Industry Data Security Standard (PCI DSS) regarding an individual’s credit card information.”

Analysis of 8.1: TfL must comply with all the relevant laws, regulations, and policies for data protection.

*IG Policy – Approval*

Policy 9.1: “This policy's revised version number and approval date are shown on the title page.”

Analysis of 9.1: Policy version number and date approved is mentioned in the title page

1. **Summary**
   1. **Summary of the analysis of the policy elements and issues that must be addressed.**
2. All information—both electronic and hardcopy—within the company must be organized, retrieved, acquired, secured, and kept up to date. TfL is a huge organization with accounts of around 6.5 million customers. Be mindful that the UK data retention laws, the breadth of prospective data storage locations, and the variety of accessible data kinds may result in further difficulties and costs.
3. Security breaches can cause serious reputational harm, fines from data authorities, criminal prosecution, and other negative outcomes. Another concern is the loss of intellectual property, and it may be quite problematic if the Freedom of Information (FOI) requests of the customers cannot be fulfilled by TfL.
4. It is also observed that severely limited or inadequate training is provided to the staff. Only 16% consistently train all employees, while 31% never undertake any training regarding the policies and regulations followed by TfL.
5. Storage and Security of the Assets must be regularly updated policies and procedures must reflect the employee’s responsibilities to minimize risks of a data breach caused by any irresponsibility.
   1. **Recommendations**
6. Organizations need to implement corporate information governance via information management automated processes. Customers will no longer be concerned with data backup and storage activities due to this technology, and TfL will have enterprise-level information management.
7. Construct a software application for information governance that stores the electronic records that the business regulations automatically need. For instance, a company information archiving solution can establish direct connections with data systems and electronic information channels including social media, email, and mobile messaging. Along with publishing, eDiscovery, and search options, a decent archiving system will also have these. Therefore, without end-user administration, your data will be automatically preserved.
8. TfL should implement automated information management systems to reduce maintenance costs and complexity. Users are freed from having to maintain their own digital records through automation, and the company will benefit from enterprise information management.
9. Strategic information disposal involves two factors. First, check to see if the disposal procedure is regulated by a current, published policy. Second, only discard data that is not currently the focus of legal restrictions or official demands. In addition to reducing the expense of eDiscovery review and storage, timely lawful disposal of material diminishes the likelihood of future involvement in legal proceedings or government information requests and increases worker productivity. When determining the return on investment of an information governance strategy, logical and reasonable disposal is a crucial factor.

* 1. **Revenue and Timeframe**
     1. The executive board oversees monitoring and offers guidance on data risk, while its Audit and Assurance Committee and the Safety, Sustainability, and Human Resources Panel offer objective data governance. The Executive Committee oversees managing risks across the organization, but every team is responsible for some aspect of our daily operations.
     2. Aiming for project closure in 2022 while finishing the assurance documentation. Despite the pandemic-related economic challenges, the project came in at £160 million under budget, bringing its expected ultimate total cost to £1.1 billion.
     3. In 2021, the TfL go app was updated with live busyness information and other features regarding inclusivity for people with difficulties. The app was nominated for a D&AD Award for inclusive design in 2021.

1. **Conclusion**

Based on the report and framework, this recognizes that the necessary governance structures are in place. While acknowledging that there is always room for improvement, it is nonetheless dedicated to keeping existing arrangements in place and, if feasible, making them better.

* 1. Maintaining a continual evaluation of its governance practises, particularly through the Annual Review.
  2. The resolution of the issues that the Internal Audit has identified.
  3. Evaluating and enhancing performance reports to concentrate on major risks and areas for development.
  4. Seeking feedback and opinions from significant stakeholders.

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