

# Creating a Strong Information Handling Culture

- Having a strong information handling culture is critical to the success of Information Risk Management. Without it, policies will fail and effort will be wasted.
- The culture must permeate throughout the organisation and must inform every person's approach to how they perform their daily tasks, regardless of seniority.
- Culture is set by the leaders at the top of the organisation. If they do not demonstrate the necessity of good information handling, the staff beneath them will not believe in it.
- The goal is to develop in all staff a good level of information risk common sense so staff can, in their day-to-day work, make sensible information risk decisions themselves.

## Why Culture is Important

Information is used throughout the organisation and by every person in one way or another according to their responsibilities and daily tasks. It is through these daily tasks that information is put at risk by poor decisions or poor practices. The damage that can be caused by poor staff behaviours can be serious. Inaccurate recording of data, careless talk, excessive distribution of documents, failing to apply security procedures, can all create dangers for the organisation, blight reputation, reduce customer loyalty, and expose a company to litigation.

A good appreciation of information risk, the forms it takes and the ways it should be mitigated, must permeate throughout the organisation and must form a part of every person's approach to how they perform their daily tasks. This is achieved by developing a

good information handling culture that makes the control and protection of information a routine part of every activity. Without a strong culture, information risk policies will be more likely to fail and much risk mitigation effort will be wasted.

## What Does Having a Strong Culture Mean?

Having a strong culture means each and every person, at whatever level they serve within the organisation, having a clear shared sense of "how we do things within this organisation". It means everyone understanding the importance information plays in the success of the organisation, the need for information to be safeguarded and assured throughout its lifecycle, plus having a clear sense of what this means for how they personally perform their day-to-day tasks.

## How Culture is Set

The culture is set by the organisation's leaders (directors, executives, senior management) and the messages they project to staff. If the leaders project an image of having no particular concern for the value of information and no particularly concern for how information is used or safeguarded, then staff throughout the organisation will follow suit.

It is not sufficient for the leaders of the organisation just to acknowledge in words that information is valuable and that risks must be mitigated. They must portray it through their decisions and actions. Staff develop their understanding of the organisation's culture more by what they see than by what they hear. Consider, for example:

- How often do staff see information stewardship discussed at Board meetings?
- How often and in what light do they see information handling being the subject of internal communications?
- Do they see information failures and breaches being dealt with transparently and openly?

## How to Assess the Culture's Strength

Key signs that indicate the strength of the organisation's information handling culture include:

- Everyone, from the top of the organisation to the bottom, will know that good information handling is a part of everyone's job – including theirs.
- Senior staff will understand they are bound by the same rules and requirements that they would expect junior staff to be bound by. They will not override information risk decisions for reasons of convenience, or turn a blind eye when senior colleagues do so.

- All staff will be able to answer general questions about their information protection responsibilities. Staff with specific risk management responsibilities will have received the training and information they need to enable them to fulfil those responsibilities.
- Everyone within the organisation will be able to make sensible information risk decisions for themselves. This will include knowing the limits of their subject matter competence and when to defer to others or refer to policies or standards for specific guidance.

## How to Strengthen the Culture

A good culture and good information risk common sense starts with an effective programme of information risk awareness and education for all staff, plus tailored training for those with specific risk mitigation responsibilities.

This should be supported by feedback mechanisms to help guide staff towards better behaviour. Staff should be shown both good and bad examples of information handling in practice so they learn to recognise bad practice when they see it and build up their knowledge of what constitutes good practice.

Feedback also demonstrates that senior management attaches importance to its information protection principles and cares that they are applied effectively.

It should be made easy for staff to take personal responsibility for ensuring the effectiveness of information handling practices. They should be encouraged to question any instruction they have been given if it seems inappropriate on information risk grounds. They should know they are expected to intervene in or, if serious, report, any instances they see of inappropriate behaviour, and should be confident they will be supported no matter how the issue is resolved.

