Title: Information Governance Annual Report

Report of the Strategic Director, Customer, Commercial and Service Delivery

Open Report For Information

Wards Affected: All Key Decision: No

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Accountable Director:
Claire Symonds, Strategic Director, Customer, Commercial and Service Delivery

Summary:
This report provides an update on Information Governance issues in the Council. The report also sets out work that has been completed in the past year by the Information Governance Board.

Recommendation(s)

The Select Committee is recommended to:

(i) Note the work that has been on-going to improve Information Governance within the Council.

(ii) Note the planned actions for 2016.

Reason(s)
To provide the Public Accounts and Audit Select Committee with an update on the Council’s Information Governance work.

1. Introduction and Background

1.1. This paper forms the annual report on Information Governance to the Public Accounts and Audit Select Committee. Information Governance primarily focuses on the Council’s obligations under the Freedom of Information Act and the Data Protection Act.

1.2. The report provides information on:
   ● Freedom of Information requests volumes
   ● Data Protection Act subject access requests volumes.
- Information about information security breaches that have been identified during the year.

2. **Information Management**

2.1. Information management includes the training undertaken by staff and data breaches reported within the council. The “Managing Information” online training course was first made available on the Council’s new i-Learn system in October 2012. To date 96% of the workforce have undertaken the module. The “Management Information” course is a mandatory course for all staff and managers are asked to check that it has been completed as part of the appraisal process.

2.2. Information data breaches continue to be reported and investigated internally to ensure that lessons are learnt. The latest information on data breach incidents is shown in the table below:

<table>
<thead>
<tr>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Computer / laptop stolen</td>
<td>2</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Confidential information disclosure</td>
<td>8</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Papers left on printer or in public area / lost</td>
<td>7</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>RSA token lost / stolen</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Unsecure email or scan sent / incorrect recipient</td>
<td>0</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Improper storage of information</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Information sent to 3rd Party</td>
<td>7</td>
<td>9</td>
<td>9</td>
</tr>
<tr>
<td>USB memory device lost / stolen</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>25</strong></td>
<td><strong>14</strong></td>
<td><strong>19</strong></td>
</tr>
</tbody>
</table>

2.3. The levels of reported breaches remain broadly consistent. Critical breaches occur about twice a year and it is these that are the main focus.

2.4. The detail of each breach is discussed at the Council’s new Assurance Group to identify issues and trends that need to be addressed.

2.5. The Council self-reported two issues to the Information Commissioner’s Office (ICO) in 2015. Both issues were caused by paper copies of personal data being made available to the wrong recipient. These incidents remain under investigation by the ICO and we have been cooperating fully with their enquiries.

3. **Freedom of Information Requests**

3.1. We saw a small increase in the number of FoI requests received by the Council in 2014/15 (2.5%).
3.2. Work continues in supporting departments in responding as efficiently as possible to respond to FoI requests, however with the return of the Complaints and FOI team to Council from Elevate in April 2015, a new centralised Feedback Team is now being formed in order to provide a more efficient and resilient service. A re-structure is shortly to begin so that the new team will be in place by the spring.

3.3. FoI Requests received:
   - In 2013/14 the Council received 1444 requests
   - In 2014/15 the Council received 1483 requests

3.4. Requests responded to within the statutory deadline:
   - In 2013/14 the Council responded to 77% of requests within the deadline
   - In 2014/15 the Council responded to 69% of requests within the deadline

4. Data Protection Act Subject Access Requests

4.1 The Council received 217 Data Protection Act Subject Access requests during 2014/15.

4.2 The Council continues to £10 charge for each request (the maximum figure allowed by government).

5. Work plan review of 2014/15

<table>
<thead>
<tr>
<th>2013/2014 workplan activities</th>
<th>2014/15 update on progress</th>
<th>Current status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establish membership of Information Governance Board and Information Governance working Group following approval of new structure.</td>
<td>This has been achieved with new Board membership, chaired by Jon Bunt.</td>
<td>The information Governance Board has now been replaced by the Assurance Group, chaired by the CE.</td>
</tr>
<tr>
<td>Establish the role of Information Asset Owner amongst managers and provide appropriate training.</td>
<td>An information assets register has been established and owners identified.</td>
<td>Limited progress has been made, though fresh impetus will be given to his in the coming months.</td>
</tr>
<tr>
<td>Develop and launch an Information Governance awareness campaign for the Council including revised posters, workshops and an updated training programme.</td>
<td>A campaign was launched with literature and posters displayed in Council buildings.</td>
<td>The campaign continues to run. Updated training was rolled out in early February 2016.</td>
</tr>
<tr>
<td>Review the Council’s approach to protective marking in the light of the new classification scheme being implemented by central government</td>
<td>Protective marking standards were downgraded by government and this standard is no longer applied.</td>
<td>No action taken as this has been re-assessed as low risk.</td>
</tr>
</tbody>
</table>
6. **Work plan priorities for 2016/17**

6.1 The approach the Council had been taking to implementing incremental information management changes has been subsumed into the recently established Ambition 2020 transformation programme. In order to deliver the Ambition 2020 programme it is recognised that a cross cutting approach to embedding information governance principles will be required. This work is at an early stage but the scope of the work will cover the following:

- Meet the new minimum standards of information maturity expected by government, as evidenced in our annual Information Governance Toolkit submission
- A new Information Management Strategy
- The development of values and principles to support an Information Promise (this will be linked to our customer service programme)
- The identification of all information assets and associated risks
- Major revisions to privacy notice statements across the Council
- The development of internal data sharing agreements
- Updated retention schedules
- Develop and introduce a more robust approach to the internal management of FoI requests
- Work will continue to ensure that all staff complete the online Managing Information training course.

**Background Papers Used in the Preparation of the Report:**

None

**List of appendices:**

None