

**Audit and Governance Committee**  
Meeting to be held on 13<sup>th</sup> April 2015

Electoral Division affected: None
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**Information Governance Arrangements - Update**

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**Executive Summary**

A progress report on Information Governance arrangements within the County Council.

**Recommendation**

The Committee are asked to note the report.

**Background**

The Committee have previously requested regular updates on progress in developing robust arrangements to manage the County Council's responsibilities to properly maintain the confidentiality and security of information.

Since the last report in March 2014, significant progress has been made to create a robust information governance function within the Council.

**Information Governance Team**

A fully resourced information governance team now resides on the 2<sup>nd</sup> Floor of the CCP building in County Hall and consists of ten members of staff all dedicated to:

- Protecting the confidentiality and security of the Council's information
- Giving public access to official information via Freedom of Information requests and access to ones own personal information via Data Protection Subject Access requests.

**Actions Completed**

Since the creation of the Information Governance Team in September 2014 the following actions have been completed:

- A dedicated intranet site has been created containing help, advice, policies and procedures for information governance. The site can be found here: <http://lccintranet2/corporate/web/?siteid=4305&pageid=18915&e=e>

- An Information Governance Framework and Annual Improvement Plan complete with performance indicators has set out the Council's plan for information governance.
- A set of renewed information governance policies have been created and these will be updated annually.
- A new security breach procedure and lessons learnt log has been created to ensure that any breaches that occur are fully investigated and lessons are learned.
- A suite of training resources including the mandatory information governance e-learning course and 29 specialised bite-sized training courses have been created. The mandatory training course has been completed by over 13,000 officers. All Heads of Service are being trained in relation to information governance.
- Information Sharing templates and advice for all services sharing information with partners and third party data sharing agreement templates for all services sharing information with suppliers processing data on our behalf, are being used and collected by the team.
- A newly created privacy-by-design advice service has been created, where the Information Governance team sit on all information related projects and offer information governance advice to protect the Councils information right at the very start of projects. The team also carry out investigations into systems or processes when risks are highlighted.
- A new risk assessment process has been devised, where drop-in sessions are offered to every Head of Service explaining their responsibilities in terms of information governance and help is given with risk assessments against any personal, sensitive, confidential, commercially sensitive or business critical information assets used within their service.
- New procedures for Freedom of Information requests and data protection subject access requests have been created to cope with increased demand and a changing workforce.
- Guidance on the best use of information is given, including records management, data quality and file and folder management in particular throughout the transformation process so that staff will be able to access the correct information within their new service areas.
- A set of Governance Groups have been set up to maintain control over information governance and highlight any risks to the Senior Information Risk Owner (SIRO – Ian Young). Information security officers from BTLS sit on these groups and offer assurance for the technical security aspects of the IT service.
- An NHS Toolkit attainment level of 90% has been reached. The NHS IG Toolkit is an online system which allows NHS organisations and partners to

assess themselves against Department of Health Information Governance policies and standards.

- A new N3 information governance statement of compliance has been approved. N3 is the name for the National Network, which provides fast, broadband networking services to the NHS and processes NHS data.
- PSN compliance has been awarded meaning the Council can connect to the Government's public service network which offers secure access to Government information.

### **Information Commissioners Office (ICO) Audit.**

At the beginning of March 2015 four ICO auditors visited the Council to audit the new information governance arrangements in place. Over 200 documents were supplied to the auditors and over 50 interviews with specialist and random staff members were carried out. As a result of the audit, the ICO will not be taking any further action on the information security breaches previously suffered within the Council. The auditors gave verbal feedback after the audit and complimented the new controls in place. The final report is due in the next month or two.

### **Internal Audit**

During December 2014 and March 2015, the Council's Internal Audit service carried out an audit into the new information governance arrangements in place at the Council. They looked at a number of controls relating to resources, breaches, roles and responsibilities, access controls, training, information sharing, records management, policies and an overarching framework.

Internal Audit complimented the new information governance arrangements in place at the Council and concluded that the Council's information governance arrangements now offered **Substantial Assurance**.

They reported that:

Significant progress had been made by the Council since responsibility for Information Governance returned from One Connect Limited, on 1 April 2014, including:

- Staff have been appointed to key Information Governance roles, including the Senior Risk Information Owner, the Caldicott Guardian, and the Head of Information Governance. The latter is also supported by a team of individual subject specialists;
- A comprehensive Information Governance framework has been developed, which is accessible, and includes a breadth of policies and procedures, including appropriate links to Records Management and Access to Information policies;
- A series of governance groups are in place to ensure that matters of significance are escalated to the relevant decision-making group for discussion and resolution;

- Action has been taken to ensure that all Council staff are made aware of their individual roles and responsibilities for Information Governance, via the refresh of the mandatory training programme and the development of additional, focused, "bite-sized" training modules;
- The Information Governance intranet pages hold further information, advice and guidance material, as well as a means of publicising key developments, pitfalls to avoid and the actions to take if a data security breach has occurred;
- Going forward, much of the responsibility for ensuring compliance with Information Governance standards will rest with Heads of Service, who have been designated as Information Asset Owners. A series of training sessions will be held early in the new financial year (2015-16) to talk Heads of Service through their responsibilities. In addition a handbook has been developed to, in particular, support them in developing and maintaining their individual Information Asset Registers; and,
- It has been recognised that whilst good progress has been made to date, there is still much to do to ensure that Information Governance is fully embedded across the council. Key developments are monitored via an Annual Improvement Plan. The Head of Information Governance has also established a range of spot checks to ascertain the success of the actions being undertaken, which will continue to be developed and refined during 2015-16.

### **Security breaches**

No information security breaches have been reported to the ICO since the last report to this committee in March 2014. The ICO have audited the new security breach arrangements and are pleased with the procedure.

### **Consultations**

N/A

### **Implications:**

N/A:

### **Risk management**

Information Governance is a growing area of work. The Government are placing more emphasis on Councils to protect the information they use everyday. Penalties for information security breaches can reach £500,000 per breach. The ICO have issued fines of over £2 million pounds to date and even heavier fines are being proposed in the new EU General Data Protection Regulations.

Alongside this, requests for access to public information (Freedom of Information requests) and requests for access to personal data (Data Protection Subject Access requests) continue to rise.

The necessity to change the culture of the Council to one where every officer and every Member respects the information they use every day remains paramount.

The robust arrangements detailed in this report will help the Council to change the culture, manage information risk and avoid significant financial and reputational damage.

### **Financial implications**

N/A

### **Local Government (Access to Information) Act 1985 List of Background Papers**

Paper	Date	Contact/Directorate/Tel
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Nil