

Report of the Director of Customer & Business Support Services

Update on Information Governance

Background

1. This report provides Members with an update on information governance developments since the last report to this committee in December 2014.

Summary

2. The Audit and Governance committee approved an information governance strategy in 2011. It was agreed to review the council's approach to and provision of, information governance and management, including the Local Government Transparency Code 2015 requirements. This is being undertaken by the Corporate Information Governance Group and will reflect recent internal audit report recommendations as well as best practice developed by the government and the Information Commissioner (ICO) including codes of practice introduced by the ICO.

Update

3. The following work and progress has been undertaken since the last report to this committee in December 2014:
 - a. Transfer of Customer Feedback team into Legal, Democratic and ICT services.
 - b. Creation of new role (completed by a restructure and assimilation process) of Transparency and Feedback Team Manager with main objective to provide strategic leadership in the development and delivery of the council's information governance arrangements, including delivering priorities across several areas such as the council's Information governance strategy, the council's data protection and information security arrangements, records management, Transparency of Information, etc.

- c. Agreement and commitment for greater council ownership, responsibility and accountability for Information Governance. This is being undertaken by a staggered approach of transferring responsibilities from Veritau to the Customer Feedback team, and the aim is to complete this by September/October 2015.
- d. A Multi Agency Overarching Information Sharing Protocol has been developed and signed up to by City Of York Council, North Yorkshire County Council, North Yorkshire Police, the York Teaching Hospitals NHS Trust and North Yorkshire Fire and Rescue Service. The purpose of this protocol is to create a positive culture of sharing information and facilitate more effective Data Sharing practices between Partner Agencies, with the aim of improving service delivery.
- e. The draft audit report for information security and further information security sweeps and visits (West Offices, Hazel Court and other council premises), have been completed by the internal auditors, Veritau. These will be reported to the next Corporate Information Governance Group and updates will be presented to the next committee meeting.
- f. Local Government Transparency Code 2015 requirements will be met via linking information published on the council website with the open data platform. Compliance monitoring will be undertaken by the Transparency & Feedback Team Manager who will report to the Corporate Information Governance Group (CIGG) and updates will be provided to this committee.
- g. A high visibility campaign (Th!nk Privacy) to drive home the importance of information and data security, has been delivered by targeting all staff employed by the council through the IComply package. The induction package on information governance and security has also been updated. These are the first steps in the development of a wider training and awareness raising programme.
- h. We have agreed to an audit by the ICO of how we process personal data which will take place by the end of August 2015. The primary purpose of the audit is to provide us and the ICO, with an independent opinion of the extent to which we (within the scope of the agreed audit – the 3 key scope areas agreed are Records Management, Subject Access to Records [SARs] and Data Sharing) comply with the Data Protection Act and highlight any areas of risk to our compliance. It will also review the extent to which we can

demonstrate good practice in our data protection governance and management of personal data. The audit is a constructive process and will provide us with real benefits and opportunities to continue to make improvements in these areas. Work is underway in preparing for this audit and further updates will be provided using a variety of mechanisms e.g. Buzz, screens in staff areas of West Offices, Members Newsletters, booked in sessions etc.

- i. The council's submission to Health & Social Care Information Centre (HSCIC) Information Governance Toolkit has been accepted by HSCIC. This means that the council is "trusted" by NHS partners and connection to the NHS network ("N3") can continue. There is an action plan for further areas to become compliant with this ahead of the reassessment due by March 2016.
- j. Registration of Caldicott Guardians in Adults and Children's Services and the Transparency and Feedback Team Manager is supporting the development of actions plans for their services areas including raising awareness, training, process for raising Caldicott Guardian issues, etc.
- k. Review of Corporate Information Governance Group terms of reference including aims and membership, will be undertaken following the CIGG meeting on 16th June 2015.
- l. The provision of a suite of information governance/management policies and procedures following review of existing ones, is nearing completion and the drafts will be presented to the next CIGG meeting and then to Legal Services before implementing across the council.
- m. The Privacy Impact Assessment (PIA) toolkit including guidance and support has been refreshed. There will be a register of completed PIAs set up in order to evidence where these have been completed however the risks identified in PIAs will be monitored through the project risk management process.
- n. A review of the council's current records management policies and procedures including retention and destruction schedules will be undertaken over the next few months. This will include how compliance and adherence will be monitored and reported going forward.

- o. A review of the council's Information Asset Register (IAR) including information asset owners (IAOs) and administrators (IAAs), privacy statements, fair processing notices, risk management etc will be undertaken over the next month.

Consultation

4. Not relevant for the purpose of this report.

Options

5. Not relevant for the purpose of this report.

Analysis

6. Not relevant for the purpose of this report.

Council Plan

7. The council's information governance framework offers assurance to its customers, employees, contractors, partners and other stakeholders that all information, including confidential and personal information, is dealt with in accordance with legislation and regulations and its confidentiality, integrity and availability is appropriately protected.

Implications

8. There are no implications to this report in relation to:-

- **Financial**
- **Human Resources (HR)**
- **Equalities**
- **Legal**
- **Crime and Disorder**
- **Information & Communications Technology (ICT)**
- **Property**
- **Other**

Risk Management

9. The council may face financial and reputational risks if the information it holds is not managed and protected effectively. For example, the ICO can levy fines up to £500k for serious data security breaches. The failure to identify and manage information risks may diminish the council's overall effectiveness.

Recommendations

10. Members are asked to consider and note the contents of this report.

Reason: To ensure Members are aware of the progress being made in the effectiveness of the council's information governance arrangements.

Annexes

11. None

Background Information

12. Not applicable

Contact Details

Author:

Lorraine Lunt
Transparency and
Feedback Manager
Telephone: 01904 552247

Chief Officer Responsible for the report:

Ian Floyd
Director of CBSS
Telephone: 01904 551100

**Report
Approved**



Date 16/06/2015

Specialist Implications Officers

Head of Civic, Democratic & Legal Services

Wards Affected: Not applicable

All

For further information please contact the author of the report