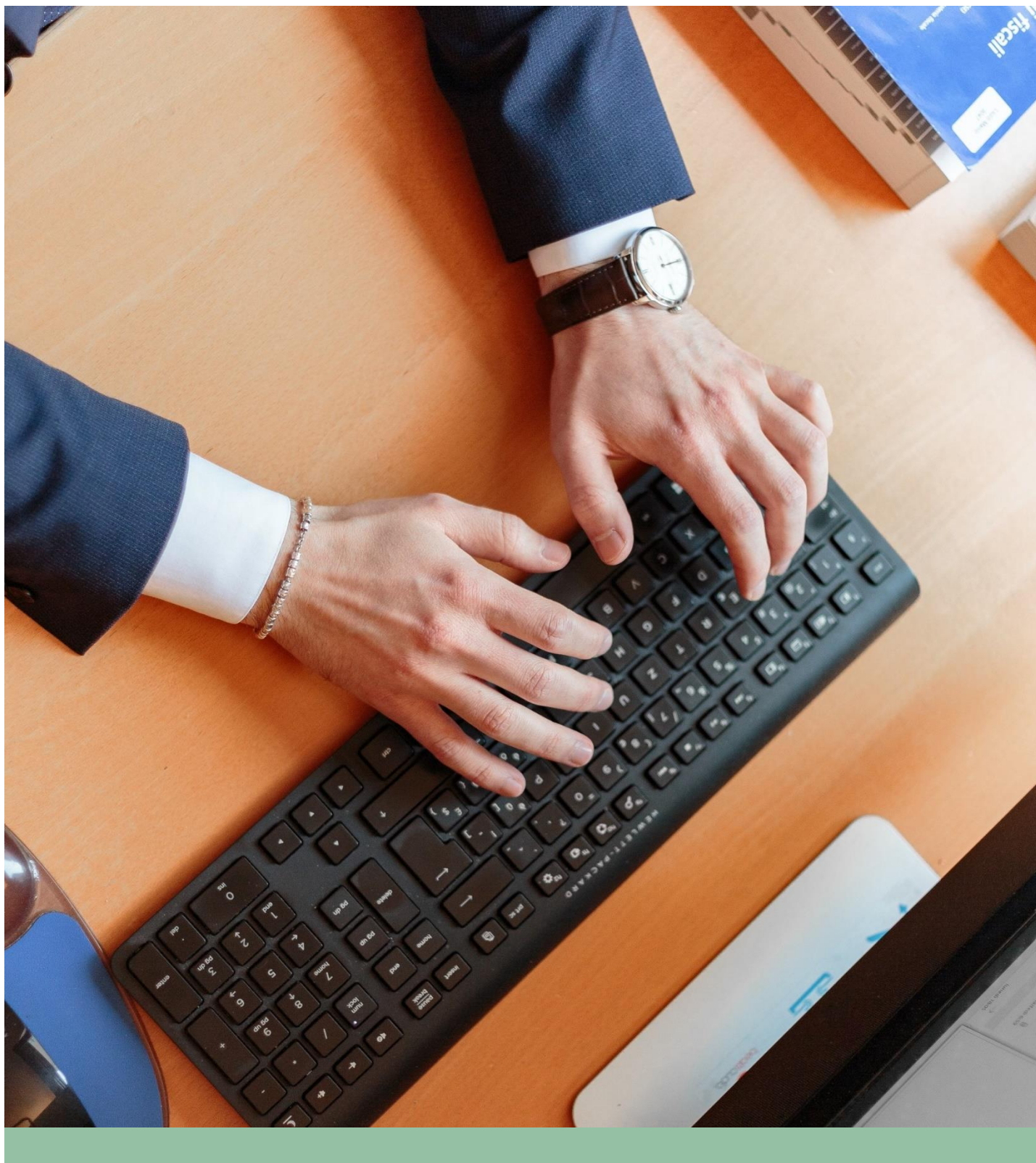


INFORMATION GOVERNANCE PROGRESS REPORT

Date: 26 October 2022

ANNEX 3



PURPOSE OF THE REPORT

- 1 To provide an update on Information Governance matters, developments in the Council's Information Governance arrangements and compliance with relevant legislation.
- 2 Information governance is the framework established for managing, recording, protecting, using, and sharing information assets to support the efficient and effective delivery of services. The framework includes management structures, policies and processes, technical measures, and action plans. It helps to ensure information is handled securely and correctly, and provides assurance to the public, partners, and other stakeholders that the Council is complying with all statutory, regulatory, and best practice requirements. Information is a key asset for the Council alongside money, property, and human resources, and must therefore be protected accordingly. Information governance is the responsibility of all employees.
- 3 The Council must comply with relevant legislation, including:
 - The Data Protection Act 2018
 - The UK General Data Protection Regulation (UK GDPR)
 - Freedom of Information Act 2000
 - Environmental Information Regulations 2004
 - Regulation of Investigatory Powers Act 2000
- 4 In March 2018, the Council appointed Veritau to be its statutory Data Protection Officer (DPO).
- 5 The Corporate Information Governance Group (CIGG) is responsible for overseeing information governance within the Council. The group is chaired by the Chief Finance Officer and provides overall direction and guidance on all information governance matters. CIGG also helps to support the Council's Senior Information Risk Owner (the Chief Finance Officer) to discharge their responsibilities. CIGG is currently coordinating the delivery of the UK GDPR action plan, which includes reviewing and updating the Council's information governance strategy and policy framework.

UK GDPR ACTION PLAN UPDATE

- 6 The Council is working to complete tasks in a new 2022/23 action plan, which has been provided to and approved by CIGG. This includes a detailed breakdown of actions required to achieve agreed deliverables. Due to Local Government Reorganisation (LGR) CIGG agreed that no new actions should be included in the action plan. Instead, the focus will be to address priority outstanding actions required to make the Council compliant with UK GDPR and the Data Protection Act 2018.
- 7 Following completion of the privacy notice review in 2020/2021, Veritau have applied relevant changes to the privacy notices via consultation with service areas. There are thirty-four privacy notices in total, seventeen of which have been completed and are being uploaded to the Council website

including Commercial Waste, Contracted Services, HR Employment and Resources, Development and Management, and Licensing. A further seventeen privacy notices are subject to ongoing review before publication onto the website.

- 8 The Council has completed the review of IG policies, and all are now published on the Council's website.
- 9 A review of the Information Asset Register (IAR) was completed in March 2022. This reflects UK GDPR compliance needs and now includes columns for law enforcement processing. Apart from two service areas the register reflects all the Council's current information assets. Two service areas, Housing and Property Services, have not completed returns and completion of these outstanding registers is being addressed within the Council. A further review of the IAR will consider alignment and consistency of information across the district councils in advance of LGR.
- 10 A gap analysis of the Council's data processing contracts was undertaken in 2021/22. Following this agreement was reached to align the process to review data processing contracts with the LGR workstream for Procurement. A review of data protection clauses will be undertaken as part of a wider evaluation of those contracts which are to be novated to the new authority and after a decision is made about which contracts are to be continued.
- 11 A gap analysis of the Council's Information Sharing Agreements (ISAs) was completed, and several areas of concern were identified. Work to re-engage with officer contacts to complete this review will commence once work on the Council's Information Asset Register and Privacy Notices is completed.

TRAINING

- 12 Veritau are offering training dates on new bespoke training on Information Incident Management and Law Enforcement Data Processing from November 2022.
- 13 CIGG are to consider the option of the Council delivering introductory data protection training developed by Veritau for ancillary staff and other employees who occasionally process personal data. This is to assist in the education of staff and help the Council mitigate risk of information incidents occurring.
- 14 In March 2022 CIGG agreed that the focus of internal training for 2022/23 will be to ensure all staff have completed data protection training. This includes new starters and temporary and agency staff, as part of their induction.

INFORMATION SECURITY INCIDENTS (DATA BREACHES)

- 15 Information Security Incidents have been reported to Veritau as required during 2022/23. The number of incidents reported in quarter 1 and quarter 2 are set out in the table below.

Information security incidents 2022/23

	Very High	High	Moderate	Low	Very Low	White	Total
Q1							0
Q2				2	1		3
Total							3

- 16 To date, Veritau have handled three security incidents in 2022/23. One of which was assessed as a very low risk and two as a low risk after investigation. The number of reported incidents is down on the equivalent point last year when the Council had handled nine incidents, one of which was a high risk.

SUBJECT ACCESS REQUESTS, INTERNAL REVIEWS & FREEDOM OF INFORMATION

- 17 Since February Veritau has processed ten subject access requests and undertaken one internal review on behalf of the Council. It has provided support and advice on six complex FOI requests.

DATA PROTECTION IMPACT ASSESSMENTS

- 18 Work is ongoing on several DPIAs. These include My View ONS data sharing and Breathing Space (a scheme administered by Wakefield Metropolitan District Council on behalf of Selby – it offers interest free secured loans to pay for an individual’s mortgage arrears and support for up to 12 months of mortgage payments).
- 19 A draft DPIA has been completed for the CCTV scheme for Selby town centre, which has been updated following a review undertaken by Veritau. Further advice is being obtained from the LGR working group to contribute to the DPIA.

LAW ENFORCEMENT

- 20 Work has been completed on assessing and recording areas within the Council where law enforcement processing is taking place. This was undertaken as part of the work to review the Information Asset Register. Except for Housing and Property Services this work has been completed. All privacy notices and information governance documents have been updated to take account of law enforcement processing.

TECHNOLOGY

- 21 Work required to ensure all IT software and hardware is compliant with UK GDPR and the Data Protection Act 2018 is progressing as part of the Council's upgrade to Office 365. Twelve business departments have transferred to Office 365 so far. Defined retention periods have been applied to documents as part of the change, except for planning documents which are currently stored on SharePoint. Appropriate retention periods will be applied as soon as the planning documents are transferred to O365. IT Services are waiting on developments from the LGR IT and Digital Governance workstream before progressing any further work to upgrade remaining departments to Office 365.