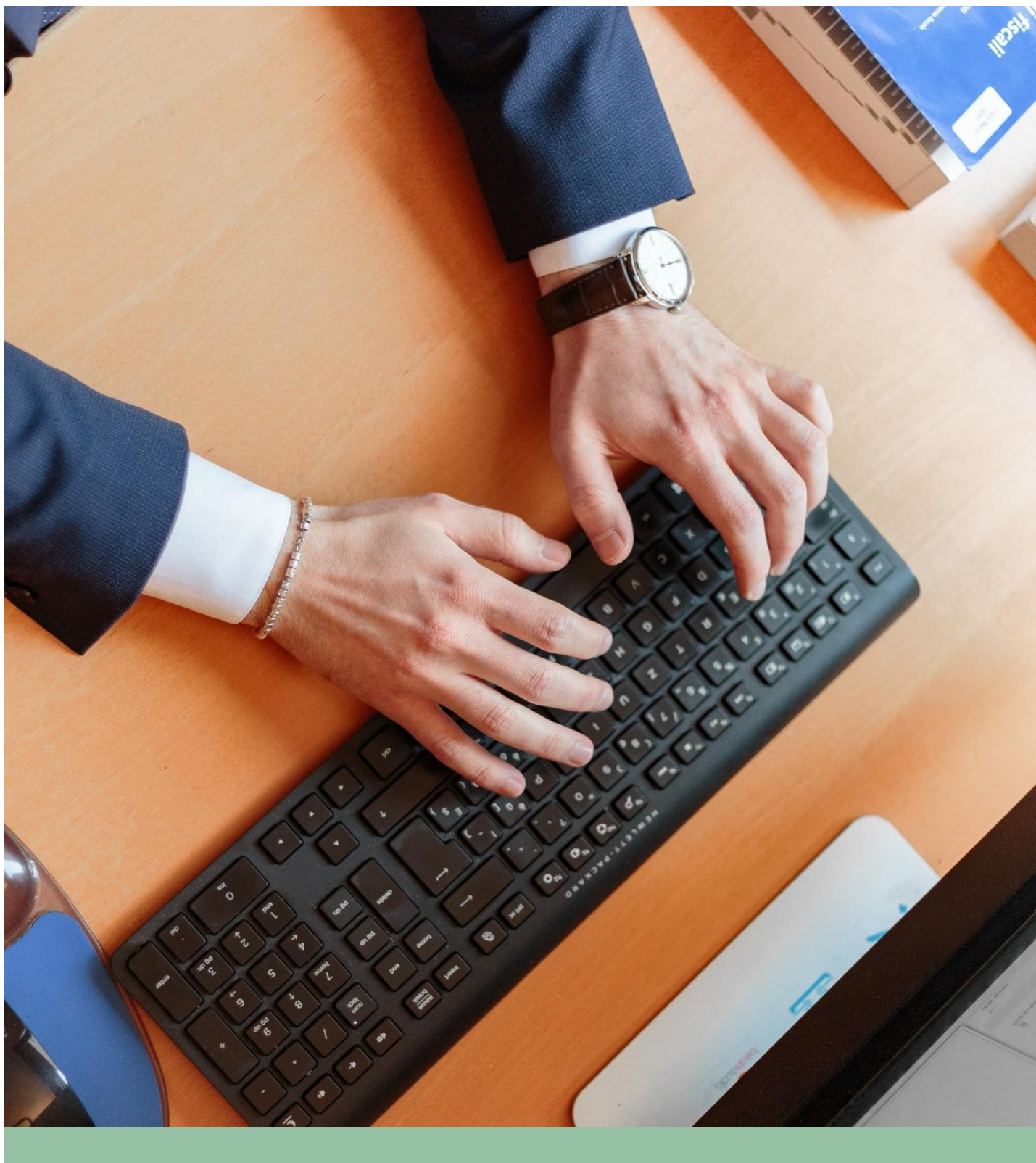


# INFORMATION GOVERNANCE PROGRESS REPORT

Date: 25 January 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 the 2022/23 action plan, which was approved by CIGG. 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. The key areas of focus are completing the review of the Council's Privacy Notices and Information Asset Register, and ensuring all staff complete the Data Protection training.
- 7 Veritau completed a review of the Council's Privacy Notices in October 2022. There are thirty-four Privacy Notices in total, and seventeen have been updated and published on the Council's website. Veritau continue to

work with officers at the Council to review the remaining Privacy Notices, but at the request of the LGR IG Working Group, focus and priority has switched to undertaking a review of all District Council Privacy Notices, to ensure they are consistent and aligned, prior to vesting day on 31 March 2023.

- 8 The review of consistency of district council privacy notices began in November 2022. It will be completed in January 2023.
- 9 A review of the IAR will commence in January 2023 to consider alignment and consistency of information across the district councils in advance of LGR.
- 10 A review of data protection clauses will be undertaken as part of a wider evaluation of Council contracts which are to be novated to the new authority, after a decision is made about which contracts are to be continued.

## TRAINING

- 11 Veritau delivered Information Incident Management training to sixty staff members in November 2022. Demand was high and Veritau are organising further workshops in January 2023.
- 12 As previously agreed, Law Enforcement training will be offered with the aim to complete the training by March 2023.
- 13 In March 2022 CIGG agreed that the focus of internal training for 2022/23 will be to ensure that all employees have completed data protection training. This includes new starters and temporary and agency staff, as part of their induction.

## INFORMATION SECURITY INCIDENTS (DATA BREACHES)

- 14 Information Security Incidents have been reported to Veritau as required during 2022/23. The number of incidents reported to the end of quarter 3 are set out in the table below.

*Information security incidents 2022/23*

	Very High	High	Moderate	Low	Very Low	White	Total
<b>Q1</b>							0
<b>Q2</b>				2	1		3
<b>Q3</b>				1	2	3	6
<b>Total</b>							<b>9</b>

- 15 To date, Veritau have handled nine security incidents in 2022/23. Three of which were assessed as low risk and three as very low risk after

investigation. Three were categorised as white incidents, which means they were either classed as a near miss or dealt with under a different Council policy. The number of reported incidents is similar to the same point last year when the Council had had nine incidents.

## SUBJECT ACCESS REQUESTS, INTERNAL REVIEWS & FREEDOM OF INFORMATION

- 16 Veritau has processed twelve subject access requests and undertaken one internal review on behalf of the Council since agreeing to undertake this work in February 2022. It has provided support and advice on six complex FOI requests. Veritau are coordinating one active SAR case with the Information Commissioner's Office on behalf of the Council. This relates to a requester complaining about proposed charges for burning recordings of telephone calls onto a CD he requested.

## DATA PROTECTION IMPACT ASSESSMENTS

- 17 Work is ongoing on several DPIAs. Veritau has agreed to review the draft DPIAs for My View ONS data sharing and Breathing Space. Veritau has provided feedback for the CCTV Scheme for Selby town centre DPIA, and the Council is now considering this further advice. Work continues on several DPIAs including, MyView, ONS data sharing and CCTV for Selby Town Centre.

## TECHNOLOGY

- 18 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 Office 365. IT Services are waiting on decisions by the ICT and Digital Governance Board before progressing any further work to upgrade remaining departments to Office 365.