# **APPENDIX C**



# **Selby District Council**

# Information Governance Progress Report Quarter Two 2019



Information Governance Manager: Head of Internal Audit:

Date:

Rebecca Bradley Max Thomas 23<sup>rd</sup> October 2019

#### **PURPOSE OF THE REPORT**

- To provide an update on Information Governance matters and developments in the Council's Information Governance arrangements and compliance with relevant legislation.
- Information governance is the framework established for managing, recording, protecting, using and sharing information assets in order 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 along with money, property and human resources, and must therefore be protected accordingly. Information governance is however the responsibility of all employees.
- 3 The Council must comply with relevant legislation, including:
  - The Data Protection Act 2018
  - The General Data Protection Regulation (GDPR)
  - Freedom of Information Act 2000
  - Environmental Information Regulations 2004
  - Regulation of Investigatory Powers Act 2000
- In March 2018, the Council appointed Veritau to be its statutory Data Protection Officer (DPO).
- The Corporate Information Governance Group (CIGG) is responsible for overseeing information governance within the council. The group is chaired by the Head of Business Development and Improvement and provides overall direction and guidance on all information governance matters. CIGG also helps to support the Council's Senior Information Risk Owner (SIRO) to discharge their responsibilities. CIGG is currently coordinating the delivery of the GDPR action plan, which includes reviewing and updating the council's information governance strategy and policy framework. CIGG has met regularly during the year.

#### **GDPR ACTION PLAN UPDATE**

- The corporate privacy notice has been updated and is available on the Council's website. Individual privacy notices are also being prepared by each service team. These are being reviewed by Veritau as they are completed and will be published on the website.
- Work will begin to review and update the information governance policy framework in October.
- The Information Asset Register has been amended to reflect GDPR compliance needs. Work is ongoing to ensure the register is correct and up to date. Veritau is working with the relevant service teams to complete this work. This work was due to be completed on the 17<sup>th</sup> September however a small

number of service areas have outstanding work to be completed. This has now been escalated to the SIRO.

#### **TRAINING**

- The Council and Veritau successfully delivered a series of GDPR briefing sessions to all Council officers in March, April, and May 2018. However, it is recognised that some teams will require further service specific training sessions. These service specific training sessions are now being planned.
- Veritau is in the final stage of finalising the training session for Data Protection Rights and Principles, planned for November 2019. The Records Management training sessions are planned for early 2020 as adjustments may need to be made due to the move to using Office 365.

# **INFORMATION SECURITY INCIDENTS (DATA BREACHES)**

- Information Security Incidents have been reported to Veritau as required. The incidents are assessed, given a RAG rating and then investigated as appropriate. Green incidents are unlikely to result in harm but indicate a breach of procedure or policy; Amber incidents represent actual disclosure, but harm is unlikely to be serious; and Red incidents are sufficiently serious to be considered for self-reporting to the ICO. Some incidents are categorised as 'white'. White incidents are where there has been a failure of security safeguards but no breach of confidentiality, integrity, or availability has actually taken place (i.e. the incident was a near miss). Only one red incident was reported to Veritau and this did not meet the threshold for reporting to the Information Commissioners Office (ICO).
- The number of Security Incidents reported to Veritau in 2019-20 are as follows:

Year	Quarter	Red	Amber	Green	White	Total
2019/20	Q1	1	0	0	0	1
	Q2	0	0	0	0	0
	Q3	0	0	0	0	0
	Q4	0	0	0	0	0
	Total	1	0	0	0	0

# **Subject Access Requests – Internal Reviews**

- Veritau do not process Subject Access Requests for Selby however we do advise on Internal Reviews when appropriate.
- 14 Veritau are currently advising on one Internal Review and are working with the service area to complete this.

# **Data Protection Impact Assessments**

## Digital Workforce Project

- Veritau are working with the service area to support the project lead with Information Governance and Records Management advice for the project duration.
- A Data Protection Impact Assessment is being developed by the project lead with support by Veritau who will sign off on the Assessment once it is completed. This is a legal requirement under GDPR to assess Data Protection risks when new technologies are being introduced. This will be completed before the system goes live.
- 17 Veritau have attended meetings in relation to this project with Phoenix Software, an external organisation.