



## **Selby District Council**

# **Information Governance Progress Report Quarter Three 2019**



<b>Information Governance Manager:</b>	Rebecca Bradley
<b>Head of Internal Audit:</b>	Max Thomas
<b>Date:</b>	29 <sup>th</sup> January 2020

## **PURPOSE OF THE REPORT**

- 1 To provide an update on Information Governance matters and 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 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
- 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 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 her 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**

- 6 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.
- 7 Work will begin to review and update the information governance policy framework.
- 8 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. Major outstanding areas include Legal, HR, Housing and Environmental

Health. Some areas require small amendments. This has been escalated with the SIRO.

- 9 A gap analysis of the Council's Information Sharing Agreements will begin. This will at first be applied to the completed service areas on the IAR and then applied to the rest once they are completed.

## **TRAINING**

- 10 The Council and Veritau successfully delivered a series of GDPR briefing sessions to all Council officers in March, April, and May 2018.
- 11 Veritau delivered one training session on Data Protection Rights and Principles in November 2019 which 21 staff attended. A second session is planned for early 2020 for those who did not attend the first one. 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)**

- 12 Information Security Incidents have been reported to Veritau as required. The incidents are assessed, given a RAG rating and then investigated as required. 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). None of the reported incidents have needed to be reported to the Information Commissioner's Office (ICO).
- 13 The number of Security Incidents reported to the Council and Veritau in 2019-20 are as follows:

Year	Quarter	Red	Amber	Green	White	Total
2019/20	Q1	1	2	0	0	3
	Q2	1	2	0	0	3
	Q3	0	7	1	0	8
	Q4	0	0	0	0	0
	Total	2	11	1	0	14

## **SUBJECT ACCESS REQUESTS – INTERNAL REVIEWS**

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

## **DATA PROTECTION IMPACT ASSESSMENTS**

### Digital Workforce Project

- 16 Veritau are working with the service area on the project board to give Information Governance and Records Management Advice for the project duration.
- 17 A Data Protection Impact Assessment has been drafted between the project lead and Veritau. This is on course to be completed before the system goes live.

## **SURVEILLANCE**

- 18 An initial scoping exercise has been completed to identify all surveillance systems. Further work is required to ensure all actions have been completed in relation to these systems which includes checking the signage for CCTV systems. Progress will continue to be reported to CIGG.
- 19 Draft policy documents and privacy notices are completed and are now subject to comments with amendments taking place in due course. Work is ongoing to review the current RIPA (Regulation of Investigatory Powers Act) Policy and this will be incorporated into the new suite of surveillance documents.
- 20 The Council have received a letter from the Surveillance Camera Commissioner dated 20 December 2019. The letter provides warning that the Council will soon be contacted by the Commissioner with a survey asking for the identification of surveillance camera systems operated by the Council. Whilst completion of the survey is not mandated, completion is urged and a report will be written based on information provided by all local authorities which will then be provided as part of the annual report to parliament.
- 21 Veritau have a meeting scheduled with Angela Crossland, the Council's Senior Responsible Person for Surveillance on 30 January 2020. At this meeting, progress will be discussed with timelines agreed. The above mentioned survey will also be discussed within this meeting.