
Senior Information Risk Owner's Annual Report

Report by Service Director Regulatory Services

EXECUTIVE COMMITTEE

26 May 2015

1 PURPOSE AND SUMMARY

1.1 This report provides the Executive Committee with a summary of information governance measures taken by both the Council's Information management team and the Information Governance Group in 2014/15. The report contains:

- (a) an assessment of the Council's compliance with the Data Protection Act 1998;**
- (b) a description of the Information Governance Group's activities in 2015; and**
- (c) a self-assessment on behalf of the Group on its effectiveness in meeting its objectives.**

1.2 Following reassignment of the Information management function to Regulatory Services, the Council has commenced a programme of updating and improving records management, Freedom of Information (FOI) and Data Protection processes. The Council's Information management team has identified a number of measures intended to further improve the Council's compliance with Data Protection requirements including the introduction of new policies and procedures and the development of additional training.

1.3 In order both to support delivery of the Council's information management function, and to ensure that there is appropriate scrutiny of all proposed Data Protection and FOI measures, the Information Governance group has been revitalised. The Senior Information Risk Owner (SIRO) considers that at present the group is effectively meeting its objectives.

2 RECOMMENDATIONS

2.1 I recommend that the Executive Committee:-

- (a) notes the content of this report which addresses previous internal audit recommendations to report on compliance with the Data Protection Act as part of the Council's annual governance review and to further improve information management practices.**

3 WORK UNDERTAKEN ON BEHALF OF THE SIRO

3.1 On 1 November 2014 the Council's Information Management team was transferred to Regulatory Services and the Service Director Regulatory Services assumed the role of Senior Information Risk Owner (SIRO). Since then officers tasked with Information governance responsibilities have commenced a programme of reviewing and updating existing FOI and Data Protection guidance, and identifying additional measures intended to strengthen compliance with Data Protection requirements. While the Council already complies with such requirements, it is recognised that there remains some scope for improvement.

3.2 The Council is obliged to comply both with the eight Data protection principles set out in Schedule 1 to the Data Protection Act 1998 and with the provisions which allow individuals to make subject access requests in respect of their own personal information. With these duties in mind the Information management team has identified that further steps could be taken:

- (a) to enhance organisational measures which prevent damage to, or loss, theft or inappropriate processing of, personal information;
- (b) to introduce a standard procedure for swiftly and effectively addressing any data breaches; and
- (c) to ensure subject access requests are processed in accordance with best practice.

3.3 To this end the following actions have been taken:

- (a) A need for additional Data Protection training has been identified. This training will consist of refresher training for all staff who have completed the current e-learning module and targeted training for staff in a variety of Council services. Work has commenced to develop and roll out a training programme.
- (b) New procedures for reporting data breaches have been developed and a data breach log has been created. This log acts as a central record of any breaches which have taken place in the Council and is maintained by the Information management team.
- (c) A new subject access request procedure similar to the one in place for FOI requests has been implemented and continues to be refined. The number of subject access requests made to the Council is increasing, and the new procedure ensures that requests are processed in a uniform and appropriately formal manner.

4 THE INFORMATION GOVERNANCE GROUP

4.1 The Information Governance Group comprised of appropriate senior officers from across service departments met in the first quarter of 2015 to consider a number of Information management issues. These included a training and workforce development programme, the monitoring of third party contracts, and statistical reports on FOI requests and subject access requests. The group also approved a password policy, a protective marking policy, and a Security Incident Reporting & Management procedure.

4.2 The Information Governance group exists to support the Council's Information management functions, and to scrutinise and discuss information management processes. The SIRO considers that, having regard to the activities outlined in 4.1 above, the group is fulfilling its role. The SIRO looks forward to continuing to work with the group and acknowledges that regular meetings are key to ensuring the effective operation of information management processes. The group will meet on a quarterly basis with the next meeting taking place no later than 30 June 2015.

5 IMPLICATIONS

5.1 Financial

There are no costs attached to any of the recommendations contained in this report.

5.2 Risk and Mitigations

- (a) Failure to follow appropriate information management processes increases the likelihood of a contravention of the Council's Freedom of Information and Data Protection duties. This risk is mitigated by the work of both the Information management team and the Information Governance group in implementing the programme of Information governance measures identified in this report, and by compliance with relevant policies and procedures across all the Council services.
- (b) This report and its content addresses previous internal audit recommendations made to report on compliance with the Data Protection Act as part of the Council's annual governance review and to further improve information management practices which are designed to minimise the risks to the Council.

5.3 Equalities

It is anticipated that there will be no adverse impact relating to considerations of race, disability, gender, age, sexual orientation or religious/philosophical belief as a result of this report

5.4 Changes to Scheme of Administration or Scheme of Delegation

No changes require to be made either to the Scheme of Administration or to the Scheme of Delegation.

6 CONSULTATION

6.1 The Chief Financial Officer, the Monitoring Officer, the Chief Legal Officer, the Service Director Strategy and Policy, the Chief Officer Audit and Risk, the Chief Officer HR and the Clerk to the Council have been consulted and any comments received have been incorporated into the final report.

Approved by

Brian Frater
Service Director Regulatory Services

Signature

Author(s)

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Background Papers: None**Previous Minute Reference: None**

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