

PLYMOUTH CITY COUNCIL

Subject: Information Asset – Annual Report
Committee: Audit Committee
Date: 13 June 2013
Cabinet Member: Councillor Lowry
CMT Member: Adam Broome (Director for Corporate Services)
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Ref: CRM/MJH
Key Decision: No
Part: I

Purpose of the report:

This report provides a summary of the work that has been undertaken by the Information Lead Officers Group (ILOG) to improve information governance principles across all Directorates in order to improve the Council's information asset.

In 2010/11 Devon Audit Practice conducted a review of information management arrangements and reported a finding of "fundamental weakness" which was reported to this Committee on [27 June 2011](#).

A specific breach of the Data Protection Act (DPA) occurred in November 2011 and a fine of £60,000 imposed by the Information Commissioner's Office (ICO).

As a result of the above Corporate Management Team approved the formation of an Information Lead Officer's Group (ILOG) which was established in February 2012 in order to implement an action plan to enable the information asset to meet the council's service delivery goals and ensure on-going legislative compliance.

The Chief Executive also nominated a Senior Information Risk Owner (SIRO) who is accountable for the council's overall Information Governance arrangements, in line with all other government authorities. Currently the Director for Corporate Services is the nominated SIRO.

Corporate Plan 2012-2015:

Information Governance is included in risk registers that include links to the Corporate Plan objectives – monitoring of control action for risks therefore contributes to the delivery of the Council's core objectives.

**Implications for Medium Term Financial Plan and Resource Implications:
Including finance, human, IT and land**

None arising specifically from this report but control measures identified in risk registers could have financial or resource implications.

Other Implications: e.g. Child Poverty, Community Safety, Health and Safety and Risk Management:

Risk Management – Information Governance is included as a risk in all directorate risk registers

Equality and Diversity

Has an Equality Impact Assessment been undertaken? No, as Information Governance applies to any data or information irrespective of its subject.

Recommendations and Reasons for recommended action:

The Audit Committee is recommended to:
Note and endorse the current position with regard to the action plan of the Information Lead Officers Group.

Alternative options considered and rejected:

Effective Information Governance processes are essential in helping to ensure compliance with legislative requirements such as the Data Protection Act and fulfilling the Council’s duty of care to its customers. For this reason alternative options are not applicable.

Published work / information:

Background papers:

Title	Part I	Part II	Exemption Paragraph Number							
			1	2	3	4	5	6	7	

Sign off:

Fin	DGN	Leg	DS	Mon Off		HR		Assets		IT		Strat Proc	
Originating SMT Member													
Has the Cabinet Member(s) agreed the contents of the report? Yes													

1.0 Introduction

- 1.1 This report provides a summary of the work that has been undertaken by the Information Lead Officers Group (ILOG) to improve information governance principles across all directorates in order to protect the council's information asset.
- 1.2 In 2010/11 Devon Audit Practice conducted a review of Information Management arrangements and reported a finding of "fundamental weakness" which was reported to this Committee on [27 June 2011](#).
- 1.3 A specific breach of the Data Protection Act (DPA) occurred in November 2011 and a financial penalty of £60,000 imposed by the Information Commissioner's Office (ICO).
- 1.4 As a result of the above Corporate Management Team approved the formation of an Information Lead Officers Group (ILOG) which was established in February 2012 in order to implement an action plan to enable the information asset to meet the council's service delivery goals and ensure on-going legislative compliance.
- 1.5 The Chief Executive also nominated a Senior Information Risk Owner (SIRO) who is accountable for the council's overall information governance arrangements in line with all other Government organisations. Currently the Director for Corporate Services is the nominated SIRO.

2.0 The Council's response

- 2.1 The inaugural meeting of ILOG took place on 22 March 2012 and the terms of reference of the group are listed in more detail in paragraph 3.0 of this report.
- 2.2 An initial list of priority issues was drawn up and incorporated into an action plan which was RAG rated based on the perceived importance of each issue.
- 2.3 A communication action plan was also drawn up and the first of a series of staff communications was circulated in March 2012 in order to begin raising awareness.
- 2.4 An Information Governance risk audit was carried out via the Operational Risk Management Group. This audit was based on 8 Information Governance principles:
 - Management Accountability
 - Policy and Processes
 - Privacy
 - Integrity
 - Authentication
 - Availability
 - Information Exchange
 - Staff Development & Training
- 2.5 The results of the audit helped ILOG to gauge the current position within each of the Directorates in order to prioritise actions and also provided a gap analysis.

3.0 ILOG Terms of Reference

- 3.1 The ILOG comprises of Information Lead Officers (ILO) for each directorate who provide the means for achieving a co-ordinated information governance framework that will develop an increasing return on information holdings and improvements to service delivery.
- 3.2 The Information Lead Officers will be responsible for reporting directly to their management teams in order to secure buy-in and commitment to initiatives instigated by the ILOG.
- 3.3 Performance will be monitored through an annual report to Audit Committee on the status of the information asset.
- 3.4 ILOs will direct work streams within the overall governance of the information asset.
- 3.5 The ILOG work plan will include promoting improvements in:
- Identifying and classifying holdings of data and information
 - Trustworthiness and reliability of data
 - Storage of electronic holdings, paper documents and physical artefacts
 - Privacy requirements
 - Information exchange and sharing
 - Information availability
 - Reducing duplication of data
 - Determining the council's approach to the information asset and providing analysis of its efficient and effective use.
 - Staff and customer awareness and compliance with responsibilities
- 3.6 The group will continue to oversee action plans arising from the Information Governance risk audit completed by the Operational Risk Management Group.
- 3.7 Activities will be implemented through Information Asset Owners (IAO) – those staff responsible for information holdings, or individual systems or applications within a service area and specialist working groups such as the Management of Information Security Form, Freedom of Information Representatives and the Operational Risk Management Group.
- 3.8 The group is also supported by the Caldicott Guardians (the AD's for social care as the responsible managers for peoples social and health data), the Corporate Information Manager, Information Security Manager and City Archivist.
- 3.9 The group meets bi-monthly.

4.0 Actions

- 4.1 Actions arising out of the group during the past 12 months include:

- Team briefings (Feb 12/Aug 12/Feb 13)
- Team Plymouth communication (Mar 12)
- Information Governance Induction booklets on staffroom (Feb 13)
- Payslip insert to staff “Your personal guide to keeping data safe” (Dec 12)
- Stop, think signage placed near printers and photocopiers
- Staffroom articles (Apr 12/May 12/Jan 13/Mar 13)
- Information Governance risk audit
- Promotion of incident reporting so that lessons can be learnt
- Each Directorate DMT has been briefed on issues by the Head of Corporate Risk and Insurance together with the Corporate Information Manager
- Office walk-throughs initiated across Directorates

5.0 Future actions over the next 12 months

5.1 Some of the forthcoming actions for ILOG are listed below:

- Freedom of Information compliance to continue to be improved
- Information Asset Owners to be identified and trained within each service area
- Carry out a further Information Governance risk audit via the Operational Risk Management Group
- Roll out Information Governance training package to all staff
- Extend office walk-throughs in all buildings
- Quantify and resolve the use of document stores by the Council
- Develop an Information Governance communication strategy

5.2 Devon Audit Practice is undertaking a County-wide review of Data Protection Act compliance which will identify areas of good practice for the Council to follow and share.

6.0 Summary and conclusion

6.1 Good Information Governance provides people with confidence that their personal information is being handled properly, protects the vulnerable, enables the delivery of services and ensures that transparency requirements are met

6.2 There are practical difficulties in trying to achieve this objective against a background of re-organisation and financial constraint and it will take a considerable culture shift within the organisation to ensure all processes and staff take appropriate care when handling data and look after the interests of the people of Plymouth.

6.3 Over the next 12 months ILOG will continue to focus on educating staff about the potential pitfalls and how each of us can reduce the risk of not meeting statutory requirements.