PLYMOUTH CITY COUNCIL

Subject:	Information Governance – Annual Report
Committee:	Audit Committee
Date:	25 June 2015
Cabinet Member:	Councillor Lowry
CMT Member:	Lesa Annear (Director for Transformation & Change)
Author:	Mike Hocking, Head of Corporate Risk and Insurance
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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. The report covers:-

- ILOG Terms of Reference
- Information Commissioners Office
- Devon Audit Partnership
- Information breach management
- Actions During 2014/15
- Future Actions
- ALARM Award

The Brilliant Co-operative Council Corporate Plan 2013/14-2016/17:

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 and Opportunity Management – Information Governance is included as a risk in all directorate risk registers.

Equality and Diversity

Has an Equality Impact Assessment been undertaken? Not required.

Recommendations and Reasons for recommended action:

The Audit Committee is recommended to note and endorse the current position with regard to the action 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 fulfulling 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: Councillor Mark Lowry

Fin	djn151 6.13	Leg	2318 6DVS	Mon Off	231 86D VS	HR		Assets		IT		Strat Proc	
Originating SMT Member , Asst Director for Finance													
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 A specific breach of the Data Protection Act (DPA) occurred in November 2011 and a financial penalty of £60,000 was imposed by the Information Commissioner's Office (ICO).

1.3 As a result of the above the 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 improve the Council's information governance resilience in order to meet service delivery goals and ensure on-going legislative compliance

1.4 The position with regard to the work of ILOG was last reported to this Committee on 25 September 2014 and this report now provides a summary of the progress of the group since then.

2.0 ILOG Terms of Reference

2.1 The ILOG comprises of Information Lead Officers (ILOs) for each directorate who provide the means for achieving a co-ordinated information governance framework that will develop improvements to service delivery.

2.2 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.

2.3 Activities will be implemented through Information Asset Owners (IAOs) – 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 Forum, Freedom of Information Representatives and the Operational Risk Management Group.

2.4 The group is also supported by the Information Governance Manager, the Customer Relations Team and the Caldicott Guardians (the AD's for social care as the responsible managers for People's social and health data).

2.5. The group meets bi-monthly.

3.0 Information Commissioners Office

3.1 The Information Commissioner is responsible for enforcing and promoting compliance with the Data Protection Act 1998. Section 51(7) of the DPA contains provision giving the Information Commissioner power to assess any organisation's processing of personal data for the following of good practice, with the agreement of the data controller. This is done through a consensual audit.

3.2 In July 2013 the Council agreed to a consensual audit by the ICO Good Practice Department and this took place at the end of April 2014. The results of this audit were presented to this Committee on 25 September 2014.

3.3 A new post of Information Governance Manager was created to support the delivery of the action plan that arose from the audit and this enabled completion of 28 out of the 49 actions to be completed before the follow up audit which took place early in 2015.

3.4 The auditors were pleased to note significant progress stating that the Council had responded to their recommendations positively.

3.5 70% of the recommendations have now been completed, with projects initiated within the Transformation programme which will result in 90% completion once they have been delivered.

4.0 Devon Audit Partnership

4.1 Devon Audit Partnership (DAP) also carried out an independent review of our information governance arrangements and the results of this were presented to this committee in March 2014.

4.2 It was agreed with DAP to put the action plan produced as a result of their audit on hold whilst the ICO action plan was being worked through as a priority.

4.3 Actions are now being revisited and worked through by the Information Governance Manager and ILOG.

5.0 Information breach management

5.1 The Information Governance manager post was appointed in 1st September 2014, and the role has been essential in managing data breaches that occurred within the Council.

5.2 Two data breaches were reported to the ICO, and due to the efficient incident management processes invoked during the breaches, the Council managed to avoid receiving any monetary penalties for either breach.

5.3 The lessons learned from all breaches, and detailed statistical analysis have been shared with many teams within the Council, with future sessions scheduled to ensure that the lessons reach as all staff.

6.0 Actions during 2014/15

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

- Action plan rolled out following ICO audit
- Continued promotion of incident reporting so that lessons can be learnt
- Office walkthroughs continuing across Directorates

- Information Governance Manager attendance at DMTs/Team meetings to raise awareness of issues
- Document storage project undertaken to scope future storage requirements
- Information Asset Owners identified within each service area
- Information Governance webpage updated for staff
- PCC hosted National Archives Information Asset Training Day on 11 June 2015

7.0 Future actions over the next 12 months

7.1 ILOG's action plan over the next 12 months include:-

- Carry out a further Information Governance risk audit via the Operational Risk Management Group
- Follow up action plan arising out of DAP audit
- Roll out Information Security refresher training for all staff
- Produce guidance booklet for non-pc enabled members of staff and Councillors
- Improve breach management processes, with a focus on greater reporting and escalation.

8.0 ALARM award

8.1 The Association of Local Authority Risk Managers (ALARM) is a public risk management association who hold an annual awards ceremony to celebrate and recognise those public service and community organisations who maintain effective and innovative forward momentum in the management of risk.

8.2 This year the Council have submitted an entry under the Strategic Risk Award in relation to our corporate Information Governance journey and the revised approach the Council have taken to improve our information governance resilience and ensure on-going legislative compliance.

8.3 The submission resulted in the Council receiving a nomination for the award, and officers will attend an award ceremony on 22 June at Aston University, Birmingham, where the team will be up against two other Public sector organisations for the main award.

8.4 The nomination recognises the improvements that have been put in place corporately to manage the risks around how we deal with our information asset and, importantly, a changing culture in the approach staff take to the way that sensitive data is stored, shared and communicated.

9.0 Summary and conclusion

9.1 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.

9.2 There are practical difficulties in trying to achieve this objective against a background of re-organisation and financial constraint, however, through the work of ILOG and

the Information Governance Manager culture shift is beginning to take place within the organisation to ensure staff take appropriate care when handling data and look after the interests of the people of Plymouth.

9.3 Where information security incidents do occur, procedures have been put in place to ensure a thorough investigation takes place so that lessons can be learned and disseminated throughout the organisation.

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