

AGENDA SUPPLEMENT (1)

Meeting: Audit Committee
Place: Online Meeting
Date: Wednesday 22 July 2020
Time: 10.00 am

The Agenda for the above meeting was published on 14/07/2020. Additional documents are now available and are attached to this Agenda Supplement.

Please direct any enquiries on this Agenda to Jessica Croman, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718262 or email jessica.croman@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225)713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

- 8 **Draft Annual Governance Statement** *(Pages 3 - 20)*
- 9 **Annual SIRO Report** *(Pages 21 - 36)*

DATE OF PUBLICATION: 20/07/2020

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Wiltshire Council

Audit Committee

22 July 2020

Subject: Draft Annual Governance Statement 2019/20

Executive Summary

The Annual Governance Statement for Wiltshire Council should demonstrate how the Council is meeting the principles of good governance adopted in its Code of Corporate Governance. A draft statement has been prepared based on the local code of corporate governance adopted by full council as part of the Constitution.

Proposal(s)

The Audit Committee is asked to consider a draft Annual Governance Statement at Appendix 1.

Reason for Proposal

The Council is required, as part of its annual review of the effectiveness of its governance arrangements, to produce an Annual Governance Statement (AGS) for 2019/20. This will be signed by the Leader of the Council and the Chief Executive after final approval by the Audit Committee. The AGS will form part of the Annual Statement of Accounts for 2019/20.

Ian Gibbons

Director, Legal and Governance / Monitoring Officer

Andy Brown

Interim Corporate Director Resources / Section 151 Officer

Jo Pitt

Director, Human Resources and Organisational Development

Wiltshire Council

Audit Committee

22 July 2020

Subject: Draft Annual Governance Statement 2019/20

Purpose of Report

1. To ask the Audit Committee to consider a draft Annual Governance Statement for 2019/20.

Background

2. The Council is required, as part of its annual review of the effectiveness of its governance arrangements, to produce an Annual Governance Statement (AGS) for 2019/20. This will be signed by the Leader of the Council and the Chief Executive after final approval by the Audit Committee. The AGS will form part of the Annual Statement of Accounts for 2019/20.
3. The format of the AGS follows advice from the Chartered Institute of Public Finance and Accountancy (CIPFA), with an onus on making it focused and readable. This is also the format of the [Local Code of Corporate Governance](#) that full council adopted as part of the Constitution on 9 July 2019.
4. The AGS for Wiltshire Council should demonstrate how the Council is meeting the principles of good governance adopted in its Code of Corporate Governance. These principles aim to ensure the Council is:
 - Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
 - Ensuring openness and comprehensive stakeholder engagement.
 - Defining outcomes in terms of sustainable economic, social and environmental benefits.
 - Determining the interventions necessary to optimise the achievement of intended outcomes.
 - Developing capacity, including the capacity of the Council's leadership and the individuals within it.
 - Managing risks and performance through robust internal controls and strong public financial management.
 - Implementing good practices in transparency, reporting and audit to deliver accountability.

5. The AGS is primarily retrospective. It reports on the assurance framework and measures in place for the financial year 2019/20, but must take account of any significant issues of governance up to the date of publication of the Statement of Accounts. This date has been extended from June under the Accounts and Audit (Coronavirus)(Amendment) Regulations 2020. The AGS should outline the actions taken or proposed to address any significant governance issues identified.
6. The AGS is drafted by senior officers who have lead roles in corporate governance. The evidence for the AGS comes from a variety of sources, including service plans, relevant lead officers within the organisation, internal and external auditors and inspection agencies.
7. In last year's Annual Governance Statement the Council identified a number of areas where further improvements could be made to strengthen its governance framework. Much of the details of these areas for improvement are covered in this year's draft Annual Governance Statement but to enable simple comparison details of the progress made on these specific areas since 2019 is summarised below:

Summary of improvements suggested in 2018/19

Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

AGS improvement actions	Current Status	
Agree an updated Corporate Equality Plan for 2019/20	A new Corporate Equality Plan has been agreed by full Council	EO
Review the arrangements for dealing with code of conduct complaints (Protocol 12 now Protocol 11)	The review has been completed with a new Protocol 12 approved and this came into effect on 1 Jan 2020 Protocol 4 – the Planning Code of Good Practice – has also been approved by full council	IG
Review and update as appropriate the Behaviours Framework	Staffing Policy Committee has agreed 'EPIC values' and an updated code of conduct to replace the existing Behaviours framework. Following branding finalisation there will be a soft rollout using lots of different channels to get messages out to staff with a gradual changeover from the framework to EPIC values	JP
Review the procurement approach to social value	A task and finish group has been established which is piloting a number of approaches to procuring added social value.	AB JH

Principle B - Ensuring openness and comprehensive stakeholder engagement

AGS improvement actions	Current Status	
Adopt a new Partnership Working Framework (replace Protocol 8 of the constitution) and undertake an audit of partnership arrangements across the council	A new Partnership Working Framework has been agreed; a review of partnerships has been undertaken but will be reviewed further in the context of recovery from the Covid-19 pandemic.	IG
Review the Wiltshire Compact and role of Wiltshire Assembly	Awaiting the promised refresh of the national Compact which will then shape a new Wiltshire Compact. A new Voluntary, Community and Social Enterprise (VCSE) strategy was due to be launched in spring 2020, inclusive of any new Compact requirements – this is now being revisited in the context of work on community recovery. Future Wiltshire Assembly meetings are under consideration on climate change and recovery.	JG
Agree new consultation policy/guidance to replace the 2015 consultation strategy	Consultation guidance has been updated and being made available to staff (including reflecting requirements during the pandemic)	IG DB
Consider options for collecting feedback from residents, including surveys	Council tax leaflet included incentive and option for newsletter and survey sign-up. The nature of surveys required is being considered as part of work on community recovery.	JG CT
Review Part 4 of the constitution in relation to petitions	This has been considered and adopted by Full Council (26 Nov)	IG

Principle C - Defining outcomes in terms of sustainable economic, social and environmental benefits

AGS improvement actions	Current Status	
Fully implement the peer review recommendations by developing an outcome-based planning process aligned to budget build	Given the current significant impact on the Council's finances and uncertainty around future funding bases, those local and from Government, has seen activity on this proposed process paused. The Council will now be undertaking an internal recovery as part of its overall recovery for Wiltshire. This will involve organisation wide transformation across a whole range of themes, with one outcome being the financial sustainability of the Council in delivering the services – these will be pointed towards the emerging priorities of the Recovery which will have specific outcomes attached to them.	AB EO
Consider additional resource for service delegation and asset transfer delivery	This has been considered and increased (including a project officer) Additional property and commercial lawyers have been deployed.	AB IG
Respond to the findings of an Ofsted inspection in May/ June 2019 building on the previous progress that has been made.	This has been taken forward through the Families and Children's Transformation (FACT) Programme. An action plan has been developed and regular updates provided to the Performance and Outcomes Board.	LT

Principle D - Determining the interventions necessary to optimise the achievement of intended outcomes

AGS improvement actions	Current Status	
Review the effectiveness of the commercial policy and current commissioning approaches.	<p>A systematic approach to a commercial review of every service has been agreed and was underway until the pandemic effectively paused the process.</p> <p>Elements of the Council’s Capital Programme around commercial investment were deferred while others are progressing. The Council’s appetite for commercial investment, given the current economic state, will be wrapped up as part of the recovery work.</p> <p>Ongoing governance of council owned companies such as Stone Circle will be considered through audit committee activity.</p>	AB SH
Implement the newly adopted Part 10 of the constitution on procurement and contract rules; aligned to a regularly updated Annual Procurement Plan and medium-term contract management strategy.	<p>Part 10 rules updated and adopted by Full Council in May 2019.</p> <p>Annual Procurement Plan paper on Cabinet forward plan for August 2020 – having been deferred from April 2020.</p> <p>Contract management paper approved by CLT and actions underway, focused on strategically important contracts – first round of contract management information to be received for end January 2020 and included in next possible Performance and Risk Cabinet report.</p>	AB JH
Embed good commissioning and contract management as part of staff job descriptions.	Procurement are reviewing information and will liaise with HR Business Partner to implement this; aligned to consideration of the relationship with the procurement hub.	AB JP JH

Principle E - Developing capacity, including the capability of the Council’s leadership and the individuals within it

AGS improvement actions	Current Status	
Rollout training and awareness on decision making processes following a review of corporate governance practices	Guidance has been drafted and rollout will take place as part of recovery once considered by ELT. Bespoke guidance to ensure good governance during the pandemic has been implemented – incorporating issues such as risk assessment, equalities and transparency. This was accompanied by a range of councillor briefings and briefing notes.	IG EO

Principle F – Managing risks and performance through robust internal controls and strong public financial management

AGS improvement actions	Current Status	
Review business intelligence (data analysis and insight)	An externally facilitated Corporate Business Intelligence (BI) Review has been completed, with a development programme formally initiated by CLT. The approach to	EO

functions across the council and supporting systems	corporate performance will be implemented by the new Executive Office.	
Review how performance can be communicated to the public to deliver maximum openness and transparency.	A refreshed approach to communication of performance as well as publishing open data will be delivered through the new Executive Office.	EO
Combine financial reporting and performance and risk reporting in the same quarterly report to Cabinet and embed good practice across the council	This is now in place	EO

Principle G - Implementing good practices in transparency, reporting and audit to deliver accountability

AGS improvement actions	Current Status	
Align organisational processes more closely to the outcomes in the Business Plan to ensure a focus on the resources used and outcomes achieved	A portfolio management approach is being implemented to align corporate programmes with the Business Plan and ensure benefits realisation. This will be reviewed as the Council moves into recovery. The financial elements of business cases have been fed into the development of corporate business case development and embedded in the council's new portfolio management approach for programmes and projects. A finance module has been part of the internal leadership and management programme since its inception for both the aspiring and developing manager programmes	AB EO
Finalise accompanying action plans for the counter fraud framework	The Anti-Fraud, Theft, Corruption and Bribery Action Plan 2019 was agreed by Audit Committee last July and work continues on the implementation of these plans.	AB/ SW AP
Deliver outstanding waste service changes and saving initiatives.	The new collection rounds for recyclable materials were implemented on 9 March 2020. This followed the construction of the new materials recovery facility which sorts the recyclable waste into individual material streams. Increasing the level of recycling should deliver future savings or avoidance of increase in costs and unfunded budget pressures due to any fall in income from the sale of recyclable materials.	PK

AB: Andy Brown, Interim Corporate Director Resources

EO: Executive Office

IG: Ian Gibbons, Director, Legal and Governance

JP: Jo Pitt, Director, HR and OD

PK: Parvis Khansari, Director, Highways and Waste

JH: Jonathon Hopkins, Procurement

SWAP: South West Audit Partnership

Main Consideration for the Council AGS - Content

8. An AGS for 2019/20 is attached at Appendix 1. The draft will be updated in the light of the observations of Cabinet and Audit Committee as well as external audit (Deloitte).
9. The Council's internal auditors, SWAP, have given an overall audit opinion of reasonable assurance on the effectiveness of the Council's control environment for 2019/20.
10. The final sections of the draft AGS require the Council to identify any significant internal control issues affecting the Council during the relevant period. CIPFA guidance suggests that an internal control issue is to be regarded as significant if:
 - the issue has seriously prejudiced or prevented achievement of a principal objective;
 - the issue has resulted in a need to seek additional funding to allow it to be resolved, or has resulted in significant diversion of resources from another aspect of the business;
 - the issue has led to a material impact on the accounts;
 - the audit committee, or equivalent, has advised that it should be considered significant for this purpose;
 - the Head of Internal Audit has reported on it as significant, for this purpose, in the annual opinion on the internal control environment;
 - the issue, or its impact, has attracted significant public interest or has seriously damaged the reputation of the organisation;
 - the issue has resulted in formal action being taken by the Chief Financial Officer and/or the Monitoring Officer.
11. The response to the COVID-19 pandemic will have immediate and undoubtedly long lasting significant financial implications for Wiltshire's economy, communities and residents as well as the Council itself. The magnitude and far reaching consequences of this unprecedented situation represents a significant governance issue for the Council, which will be addressed through the Recovery Plan agreed by the Recovery Co-ordinating Group of the LRF and endorsed by Cabinet on behalf of the Council.
12. Areas for improvement in governance arrangements will need to be considered through the lens of recovery as work progresses under the themes of the Recovery Plan. Subject to this, the following areas for improvement have been identified at this stage:
 - Deliver policy and training to embed social value across the council
 - Promote with staff 'EPIC values' and an updated code of conduct to replace the existing Behaviours framework
 - Review and agree a new Statement of Community involvement
 - Implement a new VCS strategy and review the Wiltshire Compact

- Pilot a multi-year outcome-based planning process aligned to budget build
- Review approach to service delegation and asset transfer and One Public Estate
- Review the effectiveness of the commercial policy and current procurement and commissioning approaches.
- Embed good commissioning and contract management as part of staff job descriptions.
- Rollout training and awareness on decision making processes
- Work with partners to complete a multi-agency evaluation of the response to the pandemic
- Review how performance can be communicated to the public to deliver maximum openness and transparency.
- Align organisational processes more closely to the outcomes in the Business Plan and the Recovery Plan to ensure a focus on the resources used and outcomes achieved]

13. The Council's external auditors, Deloitte LLP, will be consulted on the draft AGS and their comments reflected in the final draft.

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Director Legal and Governance / Monitoring Officer

Andy Brown
Interim Corporate Director Resources / Section 151 Officer

Jo Pitt
Director HR and OD

Report Authors: Ian Gibbons, Jo Pitt, Andy Brown and David Bowater.

Background Papers

The following documents have been relied on in the preparation of this report:
Local Code of Corporate Governance

Appendices

Appendix 1 Wiltshire Council's Annual Governance Statement 2019/20

Wiltshire Council

Annual Governance Statement 2019/20

Introduction

Wiltshire Council is a local authority that is responsible for providing services to nearly half a million residents, tens of thousands of varied businesses and over a million visitors per year. It aims to create strong communities, grow the local economy and protect vulnerable people and this approach underlines everything we do. The Council secures funding from national government, local taxation and charges. So, as a public body, it needs to have a strong governance and assurance framework to make certain its business is conducted to the highest standards, ensuring:

- resources are directed in accordance with agreed policy and according to priorities;
- there is sound and inclusive decision making, conducted in accordance with the law and proper standards;
- there is clear accountability for the use of those resources in order to achieve desired outcomes for service users and communities; and
- public money is safeguarded and properly accounted for, and continuous improvement in the way in which its functions are exercised is secured, having regard to economy, efficiency and effectiveness.

This statement reflects how Wiltshire Council has met those standards in 2019/20 and beyond; as well as the ongoing actions it is taking to maintain and improve its governance arrangements. Evidence of how we have assessed ourselves has been grouped into sections as set out by the Chartered Institute of Public Finance and Accountancy (CIPFA) in its publication 'Delivering Good Governance in Local Government Framework (2016)' and is consistent with the Local Code of Corporate Governance.

Approval of the Annual Governance Statement 2019/20

We are satisfied that this statement provides a substantial level of assurance that good governance is in place in Wiltshire Council and that appropriate arrangements are in place to address improvements identified in our review of compliance. Progress on these improvements and on addressing and mitigating the risks will be monitored through the year by senior officers and the Audit Committee.

Terence Herbert
Chief Executive

Cllr Philip Whitehead
Leader of Wiltshire Council

XX xember 2020

The Local Code of Corporate Governance provides a means of demonstrating that a sound level of governance is operated. This local code acts as a means of assurance, but also a mechanism for achieving continuous improvement. This approach is consistent with the principles of the CIPFA/SOLACE *Delivering Good Governance in Local Government* framework. The principles are set out below:



The following pages set out a summary of the key governance controls, mapped against the CIPFA principles. These are supported by case studies to help demonstrate where positive improvement action has already been taken, and a note of improvement actions that the Council will take.

Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

Respect for the rule of law

The Council's [Constitution](#) provides the framework within which the Council operates. It sets out how decisions are made and the procedures which must be followed to ensure that these are efficient, effective, transparent and accountable. The constitution is kept under review and in 2019/20 this included consideration of terms of reference for Wiltshire Pension Fund Committee and Local Pension Board, adjustments to the policy framework, reviewing the planning code of good practice, approach to petitions, new arrangements for code of conduct complaints and temporary meeting protocols for Covid-19. Bespoke arrangements have been put in place to ensure virtual meetings can take place and deliver continued councillor engagement on key decisions.

The Constitution includes at Part 13 the **Members' Code of Conduct**, which makes clear the obligation of elected members in promoting and maintaining high standards of conduct and ensuring the principles of public life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership) are adhered to. Pecuniary and non-pecuniary interests are [registered](#) and published on the web site in accordance with the requirements of the Code of Conduct and the underlying legislation.

During 2020 the LGA has consulted on a Model Code of Conduct and the Standards Committee is involved in developing a response.

Behaving with integrity

Strong commitment to ethical values

The Council publishes and promotes both a code of conduct for its staff and a **Behaviours Framework** that details what is expected of all employees. The behaviours framework is embedded throughout the employment lifecycle and forms a key part of the appraisal system to promote ethical awareness amongst the Council's staff.

There is a process for dealing with complaints under the code of conduct for unitary, parish, town and city councillors in Wiltshire. This process and its application is set by the Council and reviewed regularly by the Council's **Standards Committee**. This year a new assessment sub-committee system has been adopted. Minutes from the meetings of this Committee can be found [online](#).

Ethical considerations are also evident in the Council's [Procurement Strategy](#) where Social Value is a consideration. A task & finish group has been set up to ensure Social Value is at the forefront of all procurement activity, achieving value for money on a whole life basis for the council, communities and the economy, whilst protecting the environment.

There were 44 complaints last year, 11 in relation to unitary members, 33 parish members. 7 in total were referred for investigation. The number of complaints per year since 2012 has ranged from 27-82.

How we can improve

Deliver policy and training to embed social value across the council
 Promote with staff 'EPIC values' and an updated code of conduct to replace the existing Behaviours framework

Principle B - Ensuring openness and comprehensive stakeholder engagement

Openness

The Council makes available a range of important information on its website including its strategic aims and ambitions in its published [Business Plan](#) and via its [publication scheme](#). The council has arrangements for dealing with requests under Freedom of Information laws. In 2019/20 there were 1412 requests with 96% responded to within 20 days

Committee meetings are open to the public, and **agenda papers and minutes** are available on the internet in various formats along with forward work plans/ calendars.

Public engagement plays a key part in the decision-making process, across the full range of the Councils services. Key consultations undertaken during 2019/20 include those on Special Schools, the council tax reduction scheme, SEND strategy and Health and Wellbeing Strategy. A **communications protocol** is in place for councillors and officers

The Council supports a range of partnerships including: the [Health and Wellbeing Board](#), promoting integrated working between the council and the NHS; the [Wiltshire Police and Crime Panel](#) which reviews and scrutinises decisions of the Police and Crime Commissioner (joint committee with Swindon Borough Council); and the work of the Swindon and Wiltshire Local Enterprise Partnership ([SWLEP](#)). The Council has been an active partner in the [Local Resilience Forum](#) during pandemic and is leading a multi-agency Recovery Coordinating Group and plans for local outbreak control.

Wiltshire Council's 18 **Area Boards** involve the local community in decision-making within the agreed scheme of delegation. 124 area board meetings took place with devolved funding on community grants, youth, health and wellbeing and transport and devolved decision-making powers on community asset transfers.

The **Wiltshire Compact** is an agreed set of guidelines and principles to foster good working relationships between the voluntary sector and the public sector.

Quick, open, officer decision making is in place with the ability for local councillors to call-in **planning** decisions to committee in response to local concerns. A strategic planning committee oversees the application of the Local Plan. Expectations for [Community Involvement](#) in preparing Wiltshire's planning policy documents and in considering planning applications are clearly set out. Work has begun on updating the Statement of Community Involvement as part of a five-yearly review.

Emergency and other **officer decisions** taken under the scheme of delegation during the pandemic have been enacted with the support of the Leader and published [online](#); with regular reports to Cabinet on the key developments. Input from representative groups has been sought where appropriate and a Covid-19 task and finish scrutiny group has also been established to ensure wider councillor input continues to take place.

Engaging with institutional stakeholders

Engaging with citizens and service users

How we can improve

- Review and agree a new Statement of Community involvement
- Implement a new VCS strategy and review the Wiltshire Compact

Principle C - Defining outcomes in terms of sustainable economic, social and environmental benefits

Defining outcomes

The [Business Plan](#) 2017-27 was agreed in 2017 to enable the vision, priorities and goals set out to be translated into actions that deliver the changes required in the coming years.

Following the publication of the report of the LGA's **Peer Review** on Wiltshire Council in 2018, an [action plan](#) was developed and in July 2019 the Overview and Scrutiny Management Committee agreed that further scrutiny was not needed given progress on its recommendations.

A [Local Development Scheme](#) provides a three year rolling project plan for producing the **local development framework**

Parishes throughout the county can continue to request community asset transfers. During 2019/20 negotiation on significant **service delegation and asset transfer** packages took place with Bradford on Avon, following the successful asset transfer packages for Devizes and Chippenham Town Councils, Pewsey Parish Council and Salisbury City Council in previous years. This enables local communities more of a say, with the intention to extend this where possible.

Requirements for the public estate are likely to evolve further in coming years with related opportunities for capital receipts, jobs and housing.

The Council receives reports on the combined economic, social and environmental impacts of its policies in the form of various reports including the **Joint Strategic Needs Assessment (JSNA)**. These also inform community led action planning and inform other schemes such as the Big Pledge.

Community facilities have a key role in supporting people to live more active and fulfilled lives. The campus programme has provided sustainable assets for towns that provide a place, facilities and services that help to combat isolation and loneliness and increase the opportunities for social interaction; and in so doing build strong communities. Several campuses have been completed already and work continues in Calne, Cricklade and Melksham. Temporary closure of facilities during the pandemic has led to increased uptake of digital facilities; and consultation with local communities on safe reopening of library and leisure facilities.

Investment in transformation of **adult social care** has continued with strengths-based professional practice, increasing customer independence and reducing reliance on expensive packages of care. Close working with the NHS during the pandemic has also enabled a multi-professional discharge flow hub to be established. **Families and children** transformation has implemented improved multi-professional early support

Sustainable economic, social and environmental benefits

How we can improve

Pilot a multi-year outcome-based planning process aligned to budget build Review approach to service delegation and asset transfer and One Public Estate

Principle D - Determining the interventions necessary to optimise the achievement of intended outcomes

Determining and planning interventions

Optimising achievement of intended outcomes

Regular Performance and financial updates are reported to senior officers and councillors, including scrutiny through the **Financial Planning Task Group** which is a task group established by the [Overview and Scrutiny Management Committee](#).

The council's [annual budget](#) setting process has also seen updates to the Medium Term Financial Strategy and ongoing Capital Programme

Oversight of corporate projects is undertaken by the Corporate Leadership Team (CLT), supported with advice from Finance, Legal, HR and Procurement Teams. The **Programme Office** manages projects and programmes on behalf of the Council and provides reports to the Council on ongoing work. During 2019/20 the majority of projects were delivered or progressed according to schedule. Monthly reports were provided to CLT with appropriate actions taken.

The [Corporate Procurement Strategy](#) provides the framework for the council to obtain value and social capital from all of its bought in goods and services. The strategy focuses on the delivery of the following corporate and social goals:

Significant programmes in 2019/20 include the transformation of adult social care; families and children; and digital. A decision to defer expenditure on a number of programmes was taken by Cabinet in June 2020.

- Identifying and delivering efficiencies, but not at the expense of quality
- Developing and embracing the principles of sustainable procurement

The procurement strategy is used to encourage the adoption of a mixed economy approach, evaluating on the basis of whole life costings and breaking down barriers to participate in council opportunities. Using transparent processes, the council commits to meeting its obligation to ensure that all of our procurement activity addresses relevant social, economic and environmental standards.

Following its adoption in early 2018, the Council continues to implement the [commercial policy and approach](#) which is designed to improve our: management information; staff skills; use of assets and resources to make financial returns; and review and revise our models of delivery.

Business plans for a **local housing company** and development company were agreed by Council in January 2020. This will involve development of four council owned sites to deliver 103 units. There is also an ambitious housing revenue account programme to deliver 1000 affordable homes at social rent levels with passivhaus specification where possible.

Council has also agreed to establish a **local energy company** so that it can trade in energy produced on its assets.

How we can improve

Review the effectiveness of the commercial policy and current procurement and commissioning approaches.
Embed good commissioning and contract management as part of staff job descriptions.

Principle E - Developing capacity, including the capability of the Council's leadership and the individuals within it

Developing capacity

The Council's [People Strategy](#) focuses on attracting the best people to work for the Council and engaging, developing and retaining existing staff and will be updated to reflect internal recovery focus.

A wellbeing survey in May 2020 showed an **improvement in staff engagement** overall (+18% to 88%) since December 2018. The response to the pandemic has increased opportunities and support for homeworking, inspired new ways of communicating with staff through vlogs and live Q&As, increased the agility of the workforce through the rapid redeployment of 400 staff across a number of service areas and prompted greater focus on employee welfare.

Managers complete **annual appraisals** with their staff and use these to discuss behaviours, identify training and development needs, and develop plans to address these needs.

Following the introduction of the **apprenticeship levy** the council now has over 276 new and upskilling apprentices. A leadership and management development programme offers aspiring and developing managers the opportunity to complete accredited qualifications using levy funding. In addition, the council now has the highest proportion of staff aged under 25 in recent years – currently standing at 6.8%, some of whom are employed as apprentices.

We have continued to develop the alignment of service responsibilities to roles at the top of the organisation to ensure joined up and effective working. A **senior management** restructure at tier 3 took place in early 2020 with further restructuring following at tiers 1 and 2 resulting in the implementation of a single Chief Executive post as a focal point of leadership for recovery from the impact of COVID-19.

The council continues to learn by seeking **best practice** both regionally and nationally and responding to the findings of external inspections such as CQC and Ofsted inspections.

The council has evaluated how well we have worked with our civil contingency partners in the response to (and recovery from) the events in south Wiltshire and will be doing the same for the pandemic in 2020 given the significant implications for the county, council and partners.

As well as the training provided as part of councillor induction a range of learning material is made available to councillors online via the Wiltshire Council **learning portal**, GROW.

Developing the capability of the Council's leadership and other individuals

How we can improve

Rollout training and awareness on decision making processes
Work with partners to complete a multi-agency evaluation of the response to the pandemic

Principle F – Managing risks and performance through robust internal controls and strong public financial management

Managing risk and performance

A new [risk and performance management policy](#) was [agreed](#) in February 2019 to replace the previously separate Corporate Risk Strategy and Corporate Performance Strategy

The Council’s risks are monitored at various levels in the organisation including by [Cabinet](#) on a quarterly basis. These are now combined with financial and performance information to enable a comprehensive understanding. Managing risks is the responsibility of services who define the risks related to their service areas and assign individuals to be responsible for their management. All services risks are scored on the same basis and some service risks are elevated, through the policy, onto the corporate risk register which is published and reviewed quarterly. Bespoke risk registers relating to response to and recovery from the pandemic have also been developed.

The main **changes in risk** during 2019/20 have been relating to the implications of and uncertainty around Brexit, where the council has worked closely with its partners through civil contingency arrangements to address this possibility; and the impact of the pandemic which represents a significant threat to the continuation of the council in its current form.

Wiltshire’s section 151 Officer or **Chief Finance Officer** has a statutory duty to ensure that the Council has a strong financial control environment, including an effective and independent Internal Audit function in accordance with the Accounts and Audit Regulations.

The Council is the administering authority for more than 180 employers through the **Wiltshire Pension Fund**, and the [Pension Committee](#) exercises its responsibilities in relation to investment management where it sets investment policy and appoints and monitors external investment managers. This has included participation in the Brunel Pension Partnership (as agreed by full council). The operation of a **Local Pension Board** continues, with the purpose of scrutinising the Council as Administrator for the Wiltshire Pension Fund and ensuring the efficient and effective governance of the pension scheme.

The Senior Information Risk Owner’s **(SIRO) Annual Report**, outlines the significant work that has taken place to embed good practice and manage risk to ensure compliance across the council.

Robust internal control and strong public financial management

How we can improve

Review how performance can be communicated to the public to deliver maximum openness and transparency.

Principle G - Implementing good practices in transparency, reporting and audit to deliver accountability

Assurance and effective accountability

The Council has independent external auditors (Deloitte) and SWAP Internal Audit Services, who provide an internal audit function, Wiltshire being the biggest partner. SWAP's periodic update reports were considered during 2019/20 by the Council's [Audit Committee](#). As at April 2020, SWAP Internal Audit completed 66 internal audit reviews, to draft and final report including significant high-risk areas e.g. contract management, programme management and procurement processes. This has included action to follow up implementation. Overall SWAP assessed the Council's control environment as 'reasonable' with no significant issues raised. The Council's External Auditor has also ensured a coherent approach to fixed asset disclosures for the 2019/20 accounts in their second year as appointed auditor, having raised issues in 2018/19.

The **Overview and Scrutiny** committees in Wiltshire Council have undertaken a range of reviews to inform policy development and evaluate decisions of the executive. Key reviews include those on consultation, financial planning, maternity services, children's centres, outdoor education, climate change, homelessness, housing aids and highways. An [Annual Report](#) from the Overview and Scrutiny Management Committee sets out this activity in detail.

During the pandemic bespoke scrutiny arrangements were agreed as outlined in [Briefing Note 20-17](#)

There is a strong culture operating in the Council of acting to the highest standards. This is rooted in the behaviours expected of councillors and staff, and upheld by the senior leaders. Where any resident feels the Council has not acted properly the Council has a **corporate complaints procedure**. The Council has received the Annual Letter of the Local Government and Social Care Ombudsman. There were 103 complaints referred to the Ombudsman in the year ending 31 March 2019 versus 64 and 73 respectively in the previous two years. The number of complaints upheld by the Ombudsman were 10 versus 8 and 12 respectively in previous two years. Whilst there has been an increase in the number of referrals the numbers are still low and the slight increase is likely to reflect in part a change in approach by the Ombudsman's service where it has become more proactive in identifying its service to the general public.

Senior directors meet weekly and review on a quarterly basis progress against the ambitions set out in the **Local Code of Corporate Governance**. Quarterly updates have been provided to the Audit Committee.

The Council complies with reporting requirements such as an [online structure chart](#) and information on senior salaries and expenses.

Implementing good practices in transparency and reporting

How we can improve

Align organisational processes more closely to the outcomes in the Business Plan to ensure a focus on the resources used and outcomes achieved

INFORMATION GOVERNANCE SENIOR INFORMATION RISK OWNER ANNUAL REPORT APRIL 2019 – MARCH 2020

1. Purpose

This report provides an overview of Wiltshire Council's adherence to regulatory requirements relating to the processing of personal identifiable data under the General Data Protection Regulation and the Data Protection Act 2018 and its duty to be transparent through its compliance with the Freedom of Information Act 2000.

It ensures that the Council's Corporate Leadership Team (CLT) and Cabinet are advised of the most significant current and emerging Information Governance (IG) issues and the measures being taken by the organisation to ensure it meets the national and mandatory standards.

Specifically, this report will:

- Outline activity and performance related to information governance during the 2019/2020 financial year.
- Document organisational compliance with the regulatory requirements relating to the handling of information and provide assurance of ongoing improvement in relation to managing risks to information.
- Provide a status update on the Data Security and Protection Toolkit (DSPT).
- Detail how data incidents have been handled, including the learning from incidents.
- Review compliance with IG mandatory e-learning training.
- Give an overview of key achievements in 2019/2020.
- Priorities for IG going forward in 2020/2021.

It is important to understand that information is an organisational asset and that a strong information governance culture enables the Council to operate lawfully, efficiently and effectively.

2. Introduction

As with any project or programme, it is crucial to have an executive sponsor at board level to support, to champion the effort, to secure the resources and to execute the strategic plan.

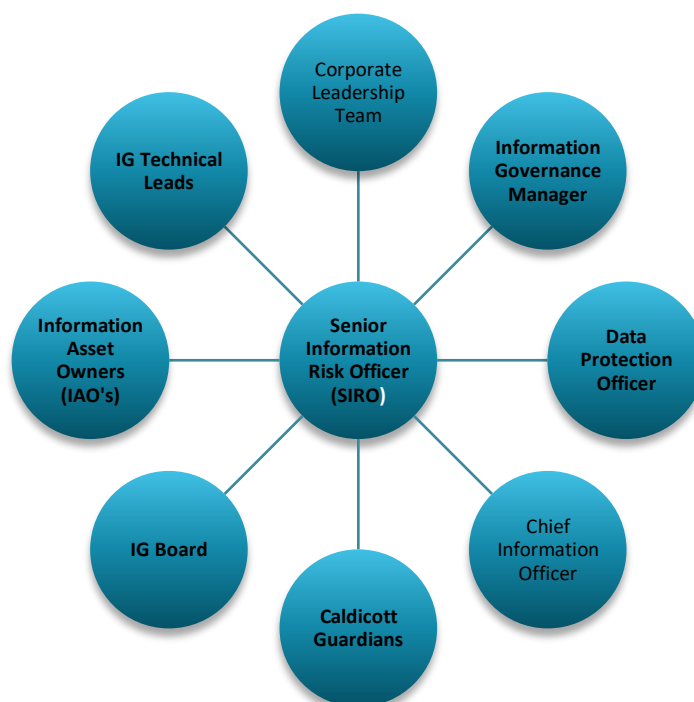
The SIRO, as part of his portfolio, understands how the strategic business goals of the organisation may be impacted by information risks.

The SIRO provides an essential role in ensuring that identified information security risks are followed up and incidents managed and has ownership of the Information Risk Policy, Risk Management Strategy and associated processes. He provides leadership and guidance to Information Asset Owners.

The SIRO's responsibilities can be summarised as:

- Leading and fostering a culture that values, protects and uses information for the success of the organisation and benefit of its residents.
- To maintain sufficient knowledge and experience of the organisation's business goals with emphasis on the use of and dependency upon internal and external information assets.
- To act as the focal point for information risk management in the organisation including resolution of any escalated risk issues raised by the Information Governance Manager, the Data Protection Officer and Information Asset Owners.

Diagram of SIRO Relationships with officers across the Council



In the 2019/2020 reporting year and previous years, the Senior Information Risk Officer (SIRO) has been the Director of Corporate Resources. For the 2020/2021 reporting period, the SIRO role will transfer over to the Director for Legal and Governance.

3. Physical Records Storage

The contract with Iron Mountain has now been running since 2016 and teams have fully engaged with the IM Connect web portal when requesting or returning files from the storage facility in Kemble. As referred to in the last report, records are delivered to and collected from service teams' areas within the hubs, ensuring a secure chain of custody is maintained.

The IG team continues to monitor the activity and associated costs in maintaining the volume of physical storage. The current position is that we have 33,485 boxes in storage which equates to 38,847.59 cubic feet, costing £ 5,827 at £0.15 per cubic foot. There has been a small reduction in storage capacity from last year when the figure was 38,901.49 cubic feet.

It is important that services actively review their storage requirements and ensure that if the information can be stored electronically, is no longer current, relevant or required for statutory reasons, that they take steps to arrange for the destruction of those records.

Part of the ongoing work for the IG team will be to work with services to define their ongoing storage requirements and challenge the need to continue to produce paper. Effective management of the Council's physical records supports the drive to migrate paper-based processes on line as set out in the Council's digital strategy and will contribute to cost savings.

4. Requests Under Freedom of Information and Environmental Information Regulations

The table below shows the number of FOI and EIR requests received by the Council for 2019/2020. In comparison to last year, the total has decreased by 22% from 1,818 in 2018/2019. The most significant reduction in requests came in March 2020 which is believed to be because of the Covid-19 pandemic.

FOI and EIR requests 2019/20	Number of requests received	% of responses within 20 working days	Number of requests where information was granted	Number of requests where information was refused	Number of internal reviews	Number of complaints to the ICO
Apr	124	99%	98	8	3	1
May	127	93%	92	16	4	0
Jun	116	89%	77	15	1	0
Jul	143	98%	104	22	2	0
Aug	108	98%	88	7	3	1
Sep	91	95%	68	12	1	1
Oct	116	98%	83	20	1	0
Nov	124	91%	93	9	2	0
Dec	91	93%	67	8	1	1
Jan	151	97%	115	13	3	0
Feb	148	96%	114	17	4	0
Mar	73	98%	53	6	2	1
Total	1412	96%	1052	153	27	5

Of the total 1,412 requests received, 96% were responded to within the statutory time limit of 20 working days compared to 98% in the previous reporting period.

Table 1 and 2 below shows, by service team, the number of requests received. The second table shows the percentage of those requests that were dealt with within the 20-working day statutory timescale.

Table 1 - Number of FOI requests in 2019/2020

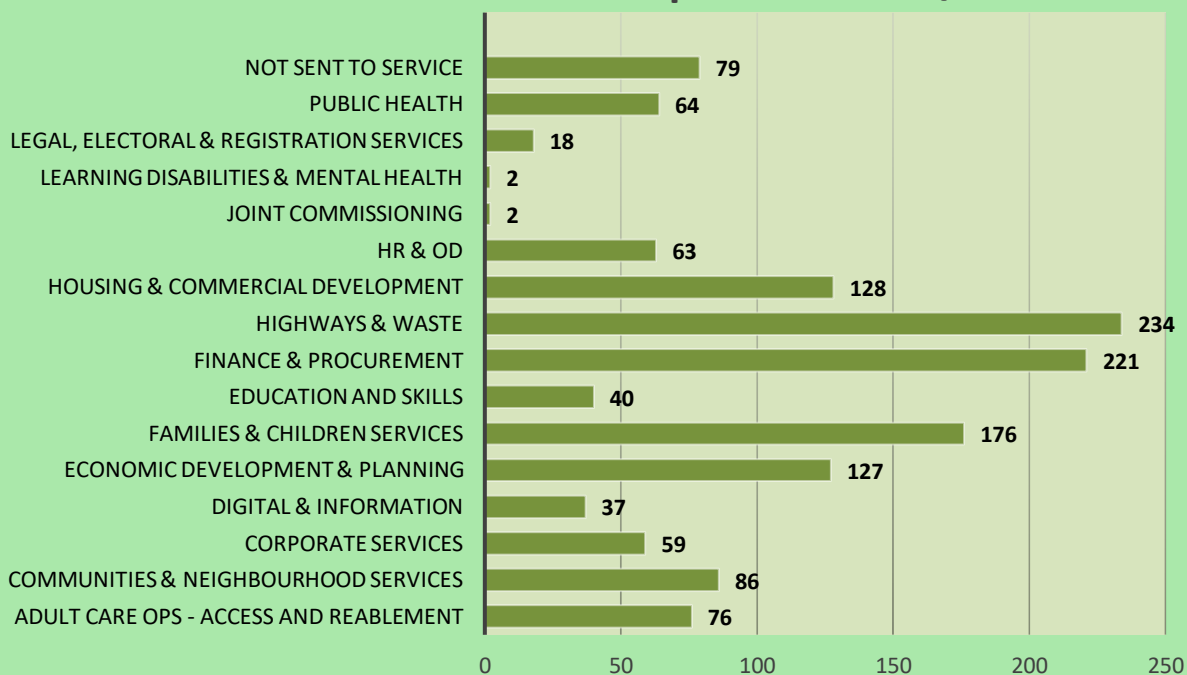
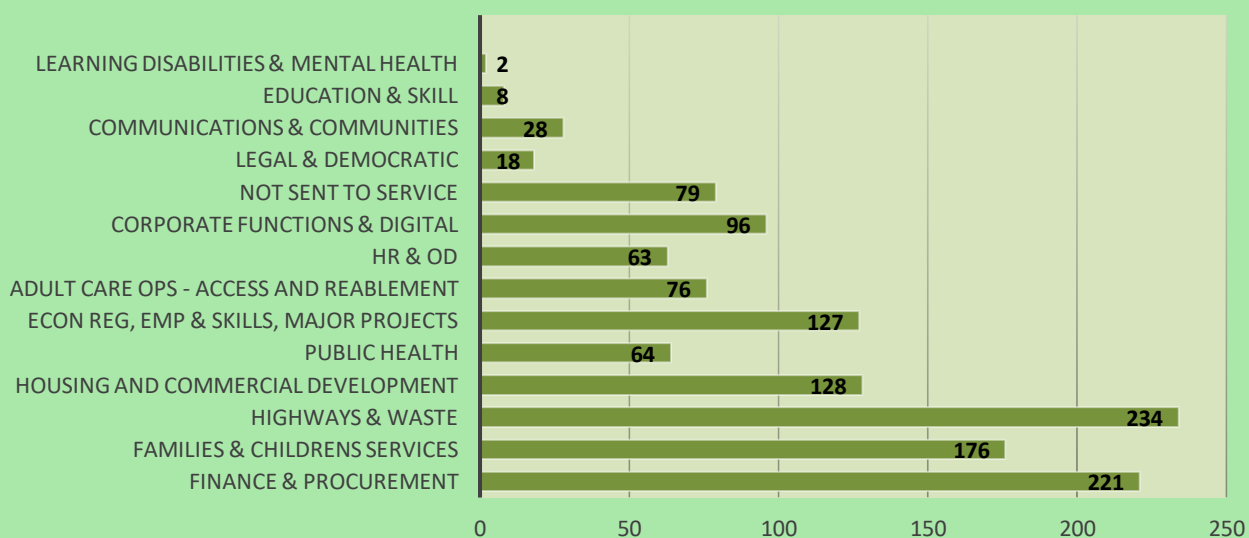
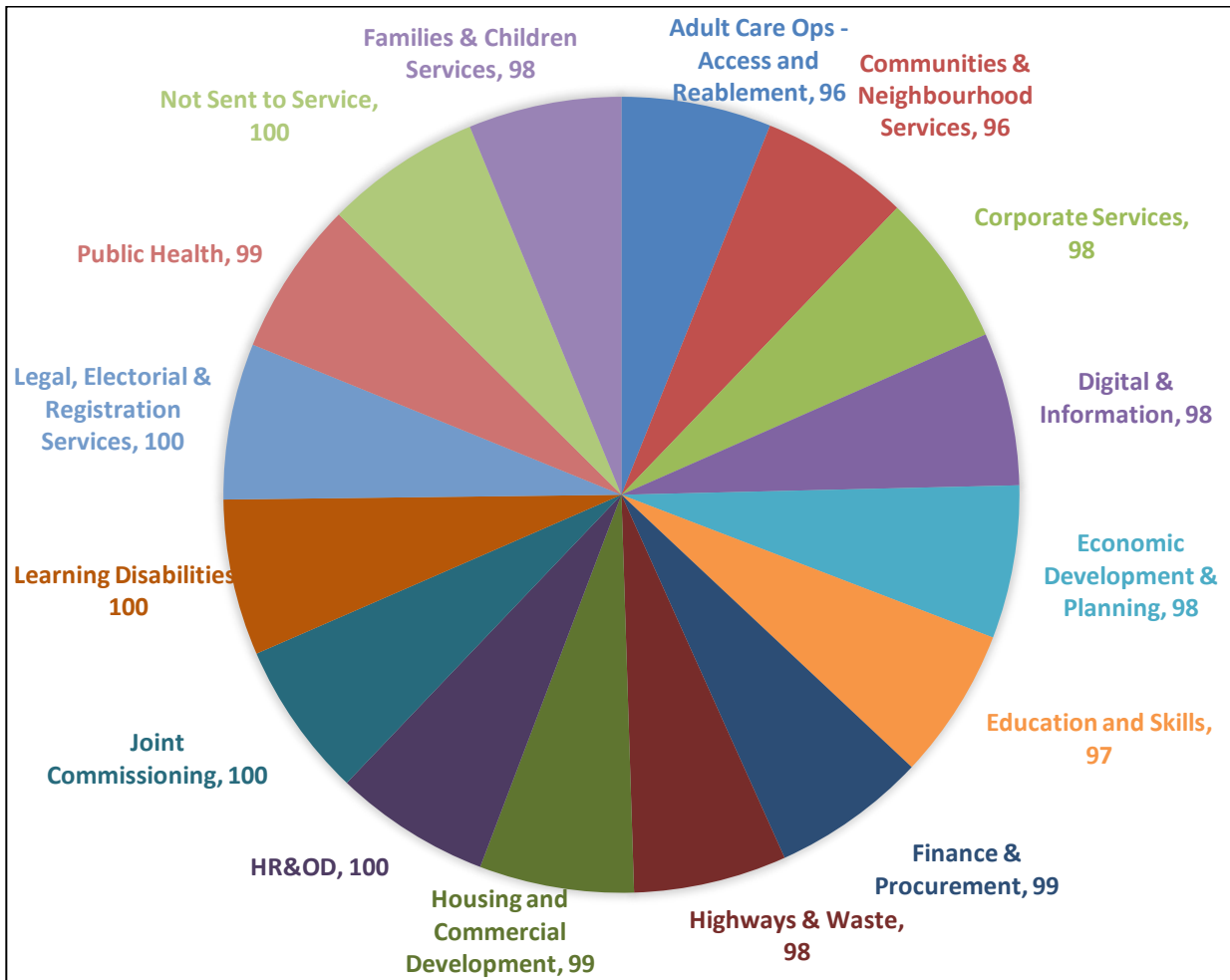


Table 2 - Number of FOI requests in 2018/2019



In terms of identifiable patterns or trends, there is nothing significant. The nature and number of requests are spread out across the organisation. Those service teams dealing with high numbers of requests are ones where we would expect there to be a high level of demand for information.

The pie chart below shows the percentage of responses met within the 20-day statutory deadline, under each directorate.



5. Publication of Information

Information over and above that defined by the publication scheme and the Local Government Transparency Code continues to be published to the Council's website adding to the wide range of material available to the public without the need to make a request to the Council.

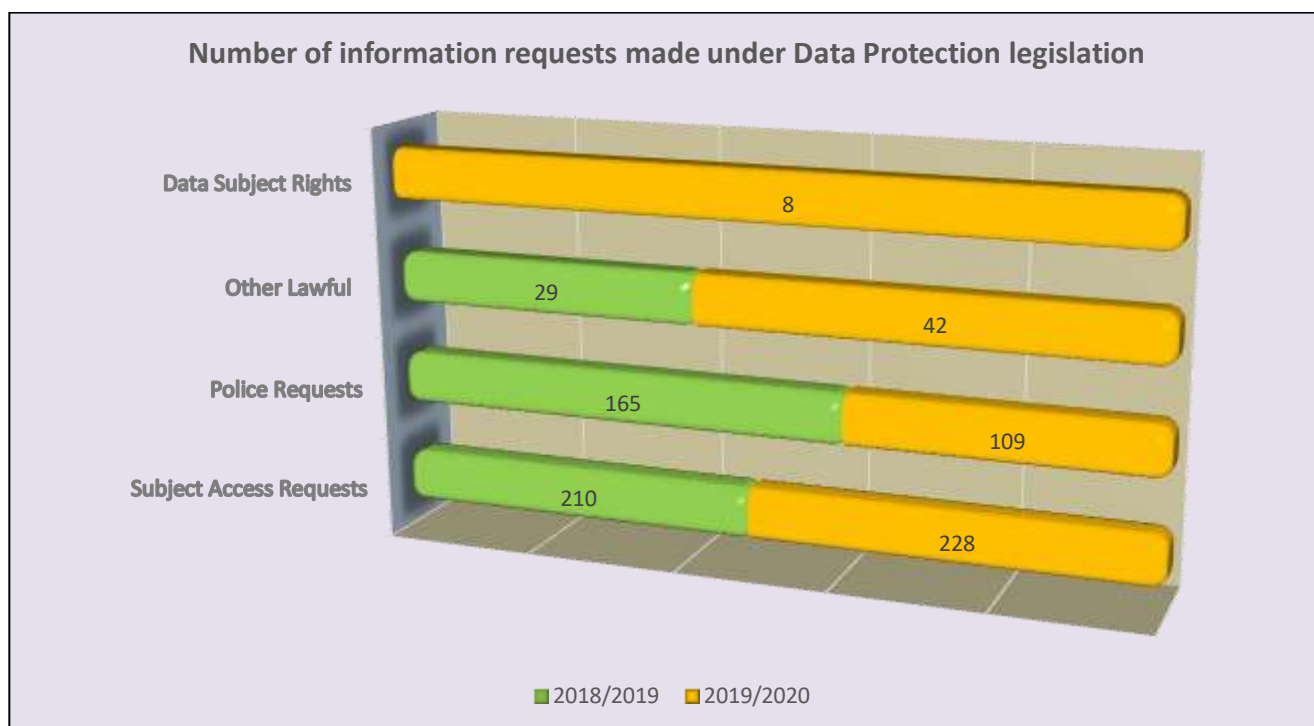
The FoI pages contain a list of standard responses to some of the most frequently submitted requests meaning that service areas no longer need to deal with a proportion of requests as the IG team can signpost requestors to the FAQ's which satisfies the legislation.

Work is ongoing with Services which receive repeat requests for the same or similar information, (e.g. Revenues and Benefits in respect of business rates), to pro-actively publish bulk information on a regular basis removing the need to respond to individual requests as they are received. This type of publication aims to reduce the pressure on Services involved in the recording and processing of requests for information.

In addition to the disclosure log which lists all FoI requests received during the preceding two years a new statistical report, which meets the ICO's expected standards of reporting is published to the website.

6. Requests for information made under Data Protection legislation

The following table shows the number of Subject Access Requests (SAR) made under Data Protection legislation, which were received by the Council for the reporting year. Percentage of SAR on time 91% with an average response time 21 days.



Subject Access requests, which are requests from individuals for their personal information, remain the core of casework. In comparison to last year numbers they have remained at a similar level. Police requests are slightly down, and other lawful requests slightly up. A new statistic gathered this year is the category of accessing other data rights such as rectification, deletion or cessation of processing.

There were eight such requests this year dealt with by the Data Protection Officer. In the majority of such cases the issue is disagreement with report and assessment content that cannot be determined as inaccuracies and the most appropriate course of action is to add to the data subject's records that they disagree with the specific content.

7. Internal Reviews, Self-referrals & complaints raised to the Information Commissioner's Office

In the reporting period, Council interaction with the Information Commissioner's Office (ICO) has differed from last year with four self-referrals for suspected serious breaches, and a further two incidents relating to the actions of a member of staff. The four self-referrals were made in June 2019, October 2019 and two in December 2019. The two incidents related to staff actions were made in September 2019 and November 2019.

In respect of the self-referrals, three were closed by the ICO with the issuing of appropriate recommendations and no punitive action. These recommendations are being implemented across the relevant service and wider where it is applicable.

One referral was considered as more serious and resulted in a formal reprimand which led to an action plan and working group to implement it under the direction of the SIRO, which has now been completed. In the reporting period, the Council's Data Protection Officer has received two letters of concern from the ICO where data subjects have referred their dissatisfaction with our service for them to investigate. The ICO has been satisfied with the Council's compliance in both cases.

8. Changes to legislation during reporting period

There have been no significant changes to primary legislation in the reporting period. We continue to learn how the new regulatory landscape regarding data protection integrates with other activity. We also continue to monitor and share where necessary, guidance and developments that are circulated by the ICO.

Towards the end of this reporting period, the COVID-19 pandemic impacted on normal working practices. Legislation and working practices have developed to facilitate the exchange and sharing of personal data in support of dealing with the emergency. The Council's Data Protection Officer (DPO) and IG Team have been actively engaged in drafting sharing agreements in support of the Council's business activities at this time.

Prior to the current emergency, it has been the intention of the DPO this year to focus on developing tools and conducting internal audits of compliance; and developing Records of Processing Activity (ROPA) which are the most significant area of outstanding compliance work. These have for the time being been put on hold but will be resurrected once recovery is underway.

9. Data Security and Protection Toolkit

Organisations such as Wiltshire Council that process and share NHS patient data and systems are required to satisfy the online self-assessment tool to provide assurance that good data security monitoring is in place and that personal information is handled correctly. Performance will be measured against the National Data Guardian's 10 data security standards.

The normal submission date is the 31st March each year. However, due to the COVID-19 pandemic impacting shortly beforehand NHS Digital advised that the submission date would be extended to September 2020.

10. Information Security/Cyber Security

The perception and understanding of Information Security – or Cyber Security – has changed considerably over the last two years, with organisations like the National Cyber Security Centre (NCSC) and the Ministry of Housing, Communities and Local Government (MHCLG) leading the way with guidance, training and action plans aimed specifically at organisations such as the Council.

The events which took place in Salisbury and Amesbury, incidents like the "WannaCry" attack on the NHS, and the cyber-attack on Copeland Borough Council have not only been high profile cases in the mainstream news and media, but they have focused the thinking and planning that organisations must now give to the threat of a cyber security attack.

During 2019, the Head of Service and Information Assurance and Monitoring Lead worked with colleagues from the Cabinet Office, NHS, and other local authorities to assist MHCLG in developing the course content for the Pathfinder series of Cyber-Security training which has been provided nationally.

Prior to the Covid-19 lockdown, the Government had agreed to provide a further year of training, and it is recommended that relevant colleagues from across the council attend to broaden the scope of this new approach across the Council. This will build on the very successful cyber training event that was held on 16th January 2020.

This training delivers several key messages, which are in line with National Cyber Security Centre (NCSC) guidance. These messages underpin the Council's approach to Cyber Security and helped to inform the planned publicity and awareness campaigns which were due to start in March.

Key points include:

- Have strong defences – wherever possible, prevent attacks reaching our information or employees. Nowadays many attacks are literally impossible for a person to detect, so ease the burden on staff and provide as much automatic protection as possible.
- Empower employees by creating a no blame culture of reporting. Colleagues should be encouraged to share their concerns and seek advice.
- Good information governance equals good cyber security – each element reduces the overall risk to information security. The information asset register identifies what information processing is critical for the Council to function. Good disposal means you only retain what you need; good information security means you know who should have access, and when.
- Ensure Business Continuity Plans consider cyber incidents, not just fire and flood – know how to work differently with limited resources and tools and ensure a cohesive approach across the Council.
- Cyber Security is not just ICT's responsibility – good recovery is about Heads of Service using their knowledge of their information and systems and working with ICT, IG and Emergency Planning to be as well-prepared as is realistically possible.

IG has collaborated with other teams on a broad range of projects and programmes across the Council, working to ensure that information security and regulatory compliance is maintained as new and more efficient ways of working are introduced.

This has included:

- Working with the procurement team on a new approach to the tendering process;
- Attendance at the Technology Authority Board to provide advice on information governance issues and risks before new assets are purchased;
- Working with colleagues in ICT and the Programme Office to ensure that information security and cyber security considerations are addressed in the early stages of a project, in line with legislation and ICO expectations. Whilst this approach has ensured proper mitigation and management of information governance risks on many projects, it has also led to an increase in demand on IG resources.

We must strive to meet the changing cyber-security requirements as they appear on the horizon to protect the Council and its residents from cyber attacks and data incidents.

11. Information sharing requests

Wiltshire Council manages a variety of information assets which are essential for service delivery. The council has a statutory requirement to ensure that its information systems and supporting processes meet security, confidentiality, data protection and data quality needs.

The Council has established and embedded a formal mechanism via its Information Asset Change Policy and its Information Sharing Policy, which provides assurance that all the above requirements have been considered for any new or re-configured asset system or business process.

In this reporting period the IG team has received 33 change requests from teams who are purchasing or developing new systems. There were 31 received in 2018/2019.

The team have also received 35 SharePoint Online Collaboration site requests. These are requests by Services who have a requirement to share information with internal colleagues and/or external third parties. There were 5 received in the 2018/2019.

12. Data Incidents

There is a very small increase in the number of incidents reported, with a total of 331 reports this year, compared to 314 in the previous period.

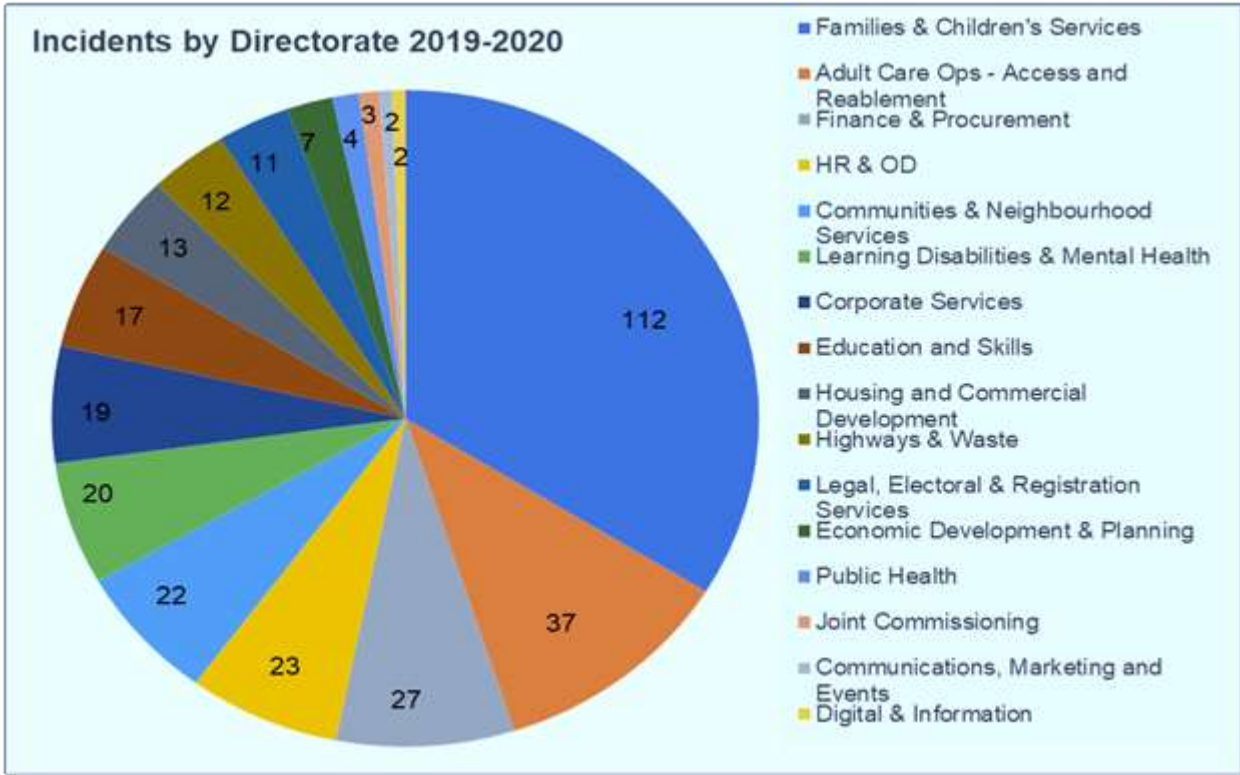
Despite the similarity in the overall figure, we believe this would have been higher if it were not for the implementation of a number of tools and measures which improve our overall cyber-security and ease some of the burden on colleagues.

IG have worked with the organisation to create a supportive culture around incident management, to ensure colleagues are not afraid to report incidents, and this is reflected in the figures we see reported each year.

Incidents by Directorate area shows little change to the areas which report the highest number of incidents (FACT, Adult Care, Finance and Procurement, and HR&OD) and this reflects the nature of the work undertaken by these areas.

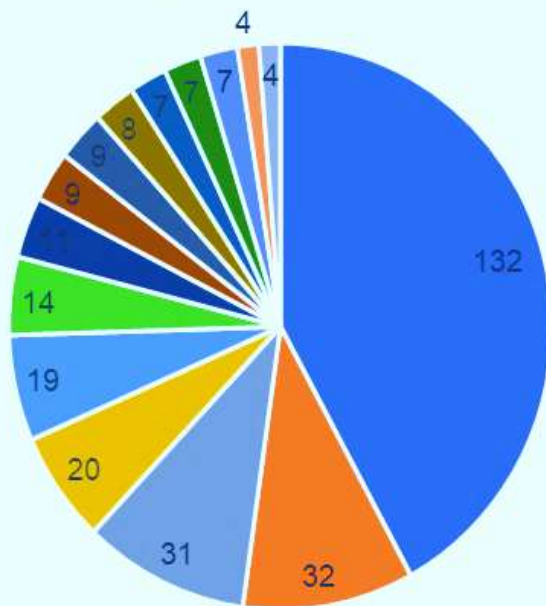
Following a number of incidents over the reporting period, the Council was subject to a reprimand from the ICO. IG worked with Directors and Service Areas to implement a variety of changes. This includes managers carrying out formal investigations with their staff if a data incident occurs. IG have developed a training package which can be delivered ad-hoc to services. This is now being rolled out as part of the standard induction package for new Council employees.

It is imperative that services continue to develop and improve their processes around managing information and work with IG to continue to embed the practices and protocols required.



Figures for the previous year are included as a comparison, although there are some changes in directorates because of restructures that have taken place.

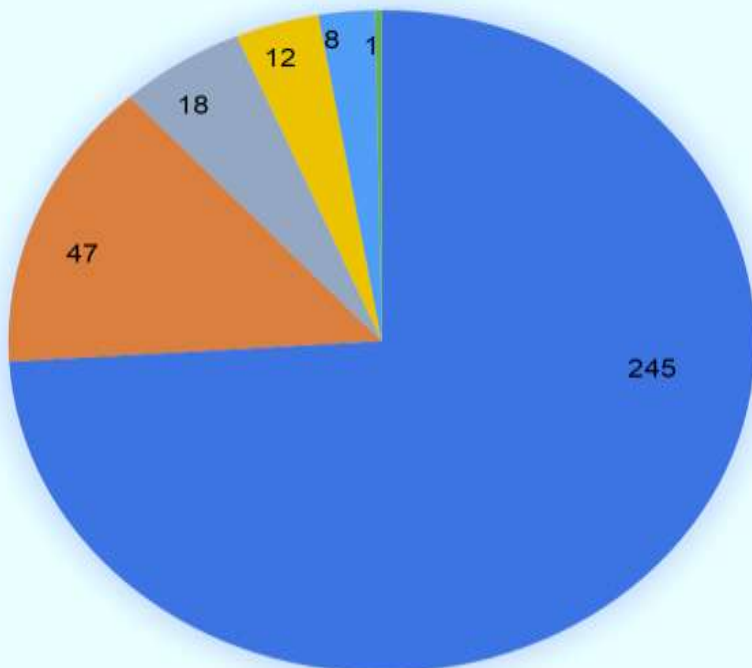
Incidents by Directorate 2018-19



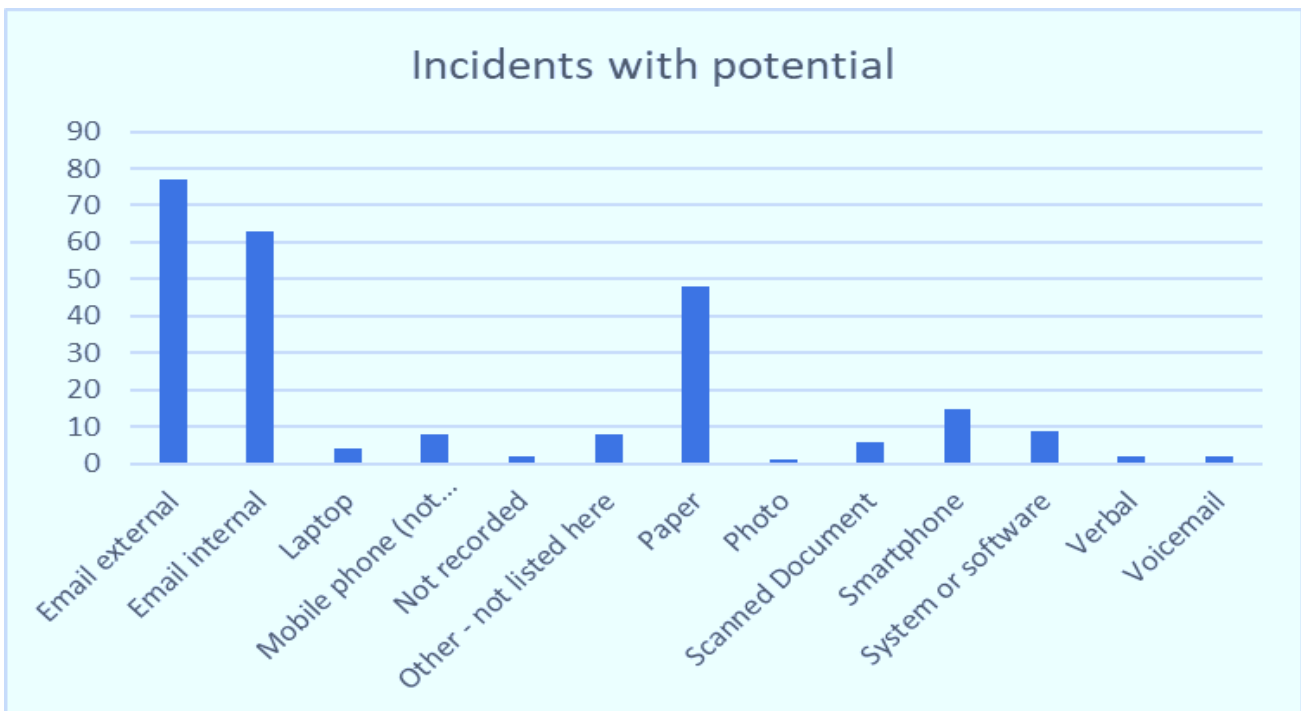
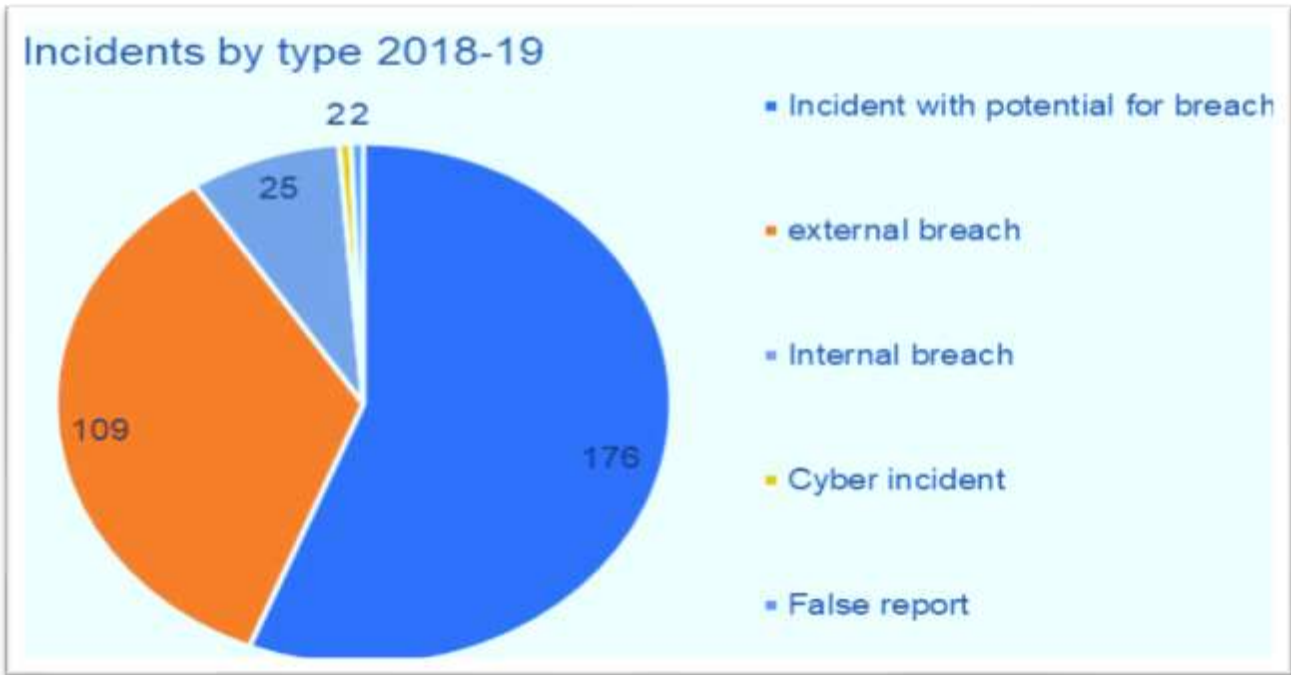
- Families & Childrens Services
- Adult Care Ops - Access and Reablement
- HR & OD
- Highways and Transport
- Finance & Procurement
- Corporate Functions & Digital
- Learning Disabilities & Mental Health
- Legal & Democratic Services
- Public Health
- Education and Skills
- Waste and Environment
- Econ Reg, Emp & Skills, Major Projects
- Housing and Commercial Development
- Commissioning
- Communications & Communities

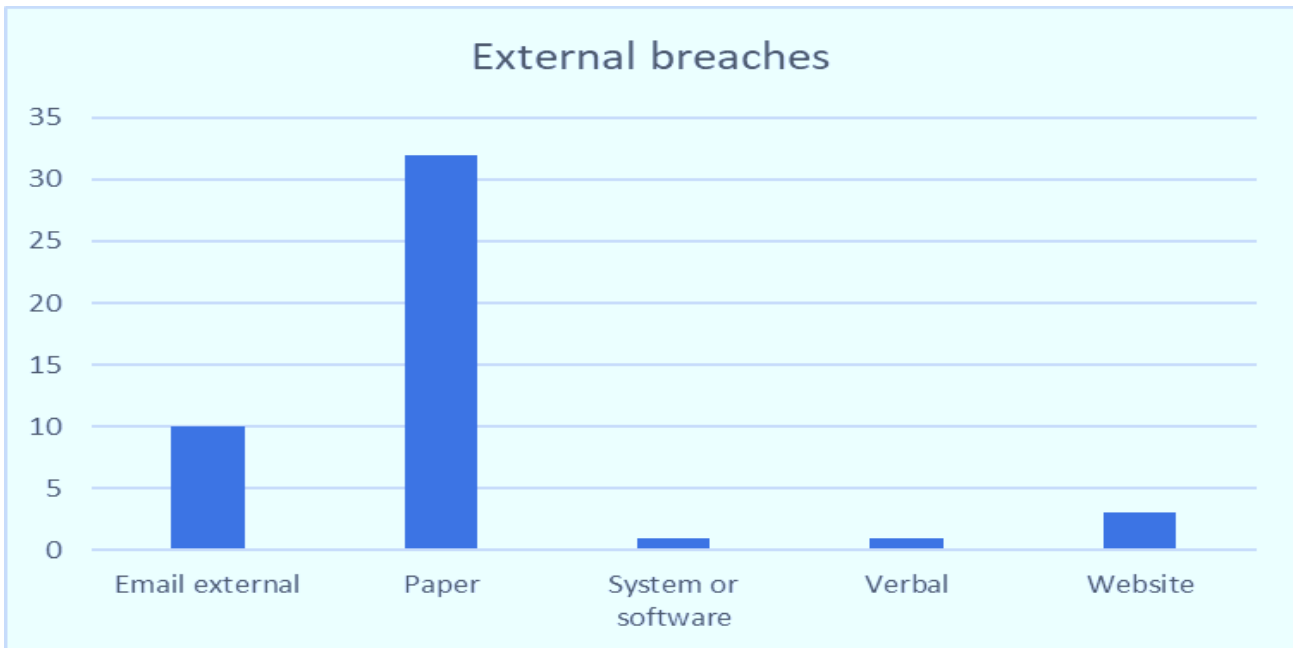
Please see Incidents by Type for the periods 2019-2020, with 2018-2019 included for comparison, below. Although most of our reports again relate to “incidents with potential for breach” we have seen some differences in incident details.

Incidents by type 2019-2020



- Incident with potential for breach
- External breach
- False report
- Internal breach
- Report from external source
- contact-preference breach





13. Data Incident Analysis

Incidents with potential are breaches where no information was sent that personally identified individuals or consisted of special category details but was still incorrectly processed or shared.

Incidents with potential for breach have increased whilst external breaches have decreased. We are now seeing the result of changes like secure email which were predicted in the previous report. So, although we may be sending wrong information, or sending information to the wrong people, the likelihood of that information being sent securely has increased (as more organisations like schools improve their email security) – and that is a factor in how we mitigate the potential severity of an incident.

Incidents where we sent information to the wrong person, or indeed sent out the wrong information, account for 67% of all incidents with potential. They also make up almost 90% of our more serious external breaches, including those referred to the ICO.

The biggest factor for external breaches was information being shared inappropriately, where 30 out of 32 incidents relate to paper copies of information being posted.

Incorrect addresses are a factor in many incidents. This is due to a mix of service users changing address without advising us, as well as processes not working correctly, and relevant records not being updated appropriately. This has resulted in two complaints to the ICO.

We continue to use tools like Data Leak Protection (DLP) and e-discovery to audit our use of tools like email, SharePoint Online and – very soon – Teams to identify areas for improvement, or in line with disciplinary concerns.

14. E-Learning Programme and Raising Awareness

IG training compliance was made a priority in this reporting period, and a target of 95% was set in accordance with the requirements of the Data Security and Protection Toolkit.

At the end of the reporting year (31st March) the completion stats were that 67.3% of staff had completed all 4 e-learning modules. A further 10.8% had completed one or more of the e-learning modules, which left 21.9% of staff who had not been able to complete any of the e-learning modules.

Although completion targets have not been achieved, significant efforts have been made to promote and encourage engagement with the training and this will continue.

As well as the e-learning modules, the IG team delivered training sessions to over 200 Children's Service staff on information security and information sharing specifically around their service area. This was done in collaboration with the Head of Service for Support and Safeguarding, to ensure a consistent message and that staff understood the importance of attending the sessions. For the most part these sessions were received positively and raised a number of points for further consideration and reflection.

Members of the IG team also attended several team meetings to speak on a range of subjects. This engagement with different service teams reinforced the messages both within the e-learning and the advice and support IG are able to provide.

The IG team continues to work with the organisation to highlight the importance of all staff, managers and elected members being aware of their responsibilities when it comes to managing information.

15. Information Governance response to the Covid-19 crisis

Towards the end of this reporting period, the country was placed in lockdown due to the Covid-19 pandemic.

The ICO provided clear updates about the ways we might need to work differently under lockdown conditions. NHS has also provided updated information to employees. Within the Council guidance was provided on the most appropriate communication channels to use during this period. For example, it was decided that 'Zoom' should not be used to conduct Council business.

A SharePoint Online Collaboration site is being used to manage Covid-19 response information.

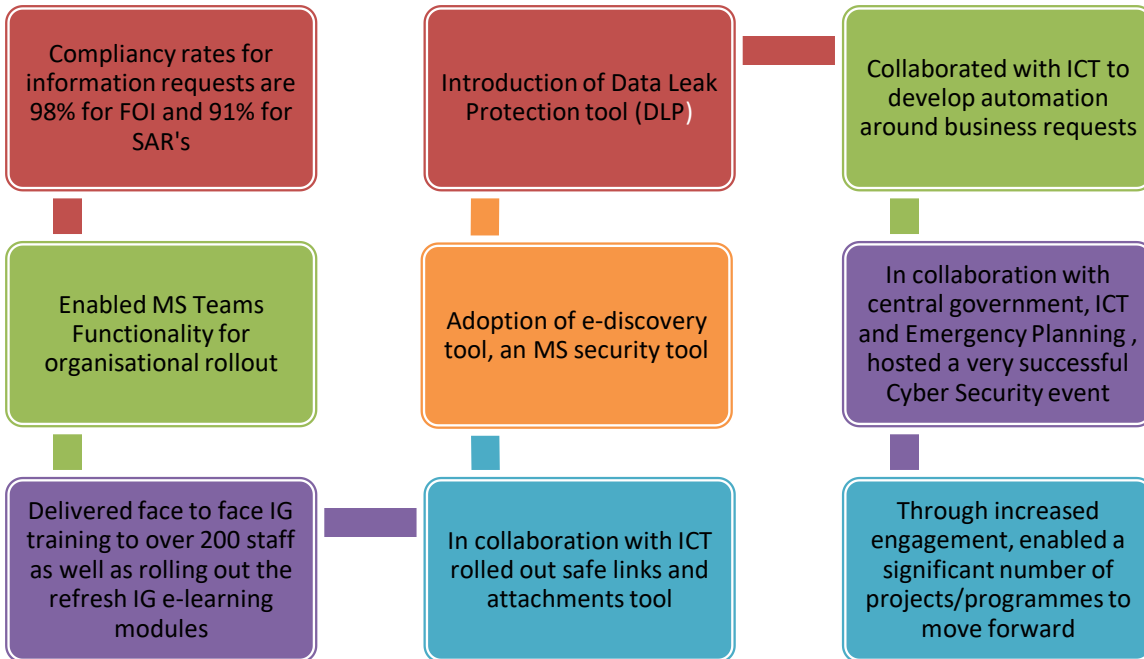
MS Teams has been introduced successfully with most staff being able to use Teams instead of Skype, which reduces our bandwidth usage. We are currently working with HR&OD to understand and respond to all usage scenarios.

Live Events in Teams was enabled for Democratic Services to deliver council meetings virtually putting us in a good place to be able to use that solution in a variety of scenarios to enable "face to face" events to take place. This will be rolled out further for other committee meetings and Area Boards in September.

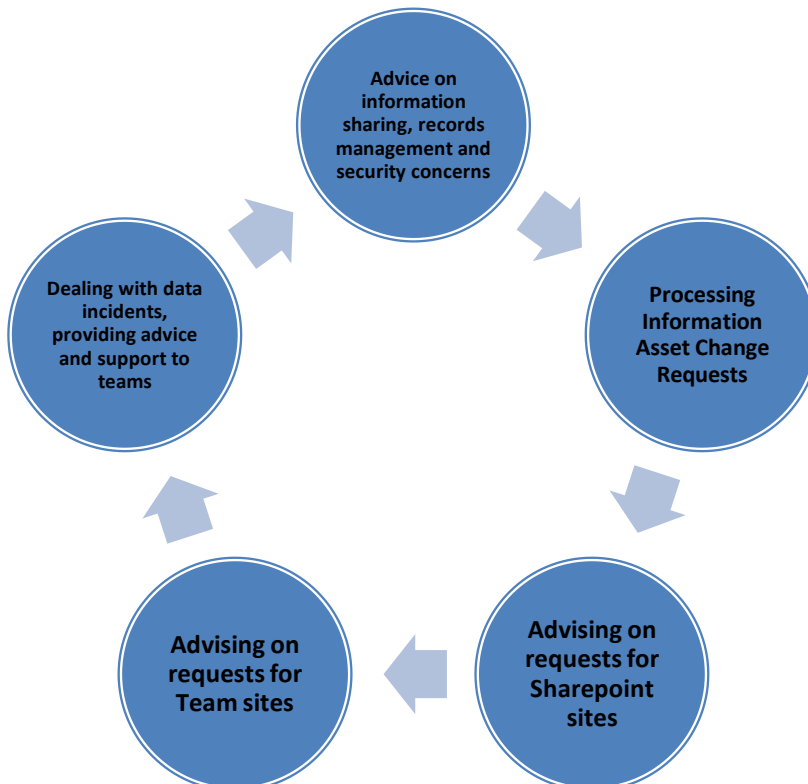
We continue to receive a higher than usual number of queries and concerns around information security and data protection. On average, this Council receives 595,000 spam emails per month. Within those emails is a variety of content, some of which would have a significant impact if not blocked. We receive a high number of cyber-attack attempts throughout the year and, as has been well documented in the media, this threat increases during an event like a pandemic. With this increase in threat level, and the likelihood that we will roll out new tools and ways of working at pace, it is even more vital that the council remains vigilant and meets cyber-security requirements by early engagement with IG.

16. Key achievements

These include:



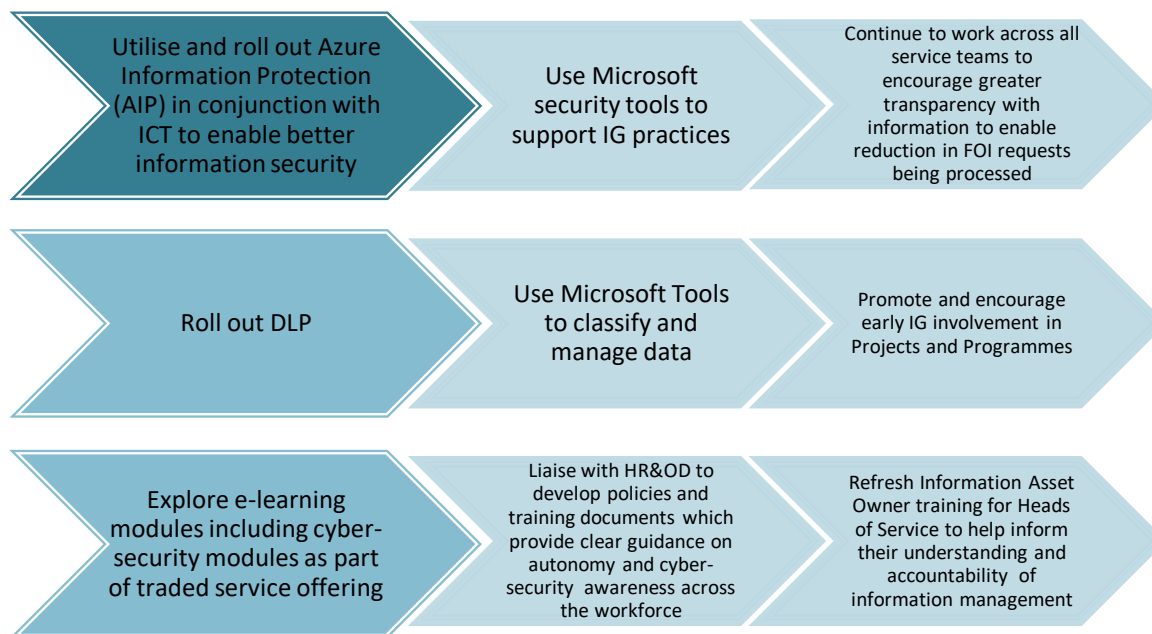
In addition the team's work includes:



Special thanks to the IG team for their work and commitment over the last year in this challenging area of the business.

17. Looking Forward

There is a large portfolio of work that Information Governance will be taking forward in the next reporting period. The IG team will be focusing on the following priorities:



IG will also have a significant role in the recovery phase of the COVID-19 pandemic, particularly in supporting the internal recovery theme.

18. Summary

Good information governance is essential for the efficient and effective delivery of the Council's business and open and transparent decision making. Everyone has an important part to play in achieving this and the IG team will continue to work with Members and officers internally and partners externally to this end.

Ian Gibbons, Director, Legal and Governance and SIRO

15 July 2020

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