Wiltshire Council

Audit Committee

26 October 2016

Information Governance

Executive summary

The purpose of this report is to update the Audit Committee on progress with the information governance improvement programme.

A progress report was provided to the ICO in May 2016 and the Council received agreement and sign off of its action plan, with no further updates requested.

The programme continues to address the findings identified by the Information Commissioner's Office (ICO), with key actions already having been delivered and a 2 year programme in place, identifying timescales for further improvements, which are beyond the scope of the ICO audit and will seek to provide the organisation with a robust framework for even better compliance with statutory Governance requirements.

Proposal

That the Committee notes:

a) the significant steps that have been taken to address and rectify the findings identified by the Information Commissioner's Office (ICO) and the audit engagement with them is now complete.

b) the continued progress to address the actions identified in the two year improvement programme, which goes beyond the ICO requirements to fully inculcate a new information governance culture and practices across the organisation, whilst ensuring compliance with statutory legislation.

c) that a further report will be submitted to the Committee in January 2017

Reason for proposal

Report provided for information only.

Dr. Carlton Brand, Corporate Director
Wiltshire Council

Information Governance

Purpose of report

1. To inform the Audit Committee of the progress of the improvement programme that has been set up to address the findings identified by the ICO.

Background

2. In March 2015 the Council invited the ICO to come and conduct a voluntary audit of the Council's arrangements for the processing of personal data. The audit focused on records management; subject access requests and data sharing. The overall conclusion only a limited level of assurance could be found that data protection compliance was being maintained, that there were adequate processes and procedures and that there was considerable scope for improvement in the areas inspected.

3. An information governance improvement programme has been developed to address the recommendations in the ICO's report and is based on the NHS and Local Authority Information Governance Toolkit (version 13), which is recognised as providing a comprehensive set of standards for information governance and meets with the approval of the ICO.

4. The ICO provided some constructive feedback on the action plan in April 2016 and advised that the audit engagement is now complete. It is acknowledged that whilst some of the timescales have moved from the original plan, the ICO Board felt it is important that the organisation does not have a rapid, quick fix approach to put things right; but that there is the creation of a much more sustainable framework and strategy for Information Governance across the Council.

5. Progress with the improvement programme up until July 2016 was included within the Annual Governance statement and SIRO report, which were presented to the Council's Audit Committee on 27 July 2016. A copy of the improvement plan is attached as *Appendix 1*. Previous reports to Committee may be found at the link below:

    [Previous Information Governance Audit Reports](#)

    Information Governance was specifically included in reports of the 27 October 2015, 26 January 2016 and 27 July 2016.

Main Considerations for the Committee

6. Substantial progress is being made in the areas for improvement identified in the ICO's report. The current position is as follows:

Scope area	Number of recommendations in each scope area from the original audit report	Number of actions complete, partially complete and not implemented.
Records Management	31	16 Complete 15 in progress
Subject Access Requests	27	7 Complete 20 in progress
Data Sharing	16	6 Complete 10 in progress
TOTAL **TOTAL COMPLETE** **TOTAL IN PROGRESS**	**74** **29 (39%)** **45 (61%)**	

NOTE: The total number of recommendations has been reduced by 5 from the SIRO report, as a number of action points have been amalgamated.

Restructuring of Information Governance Function

7. The new Information Governance team is now complete and a structure chart is below for reference:

Information Governance Structure
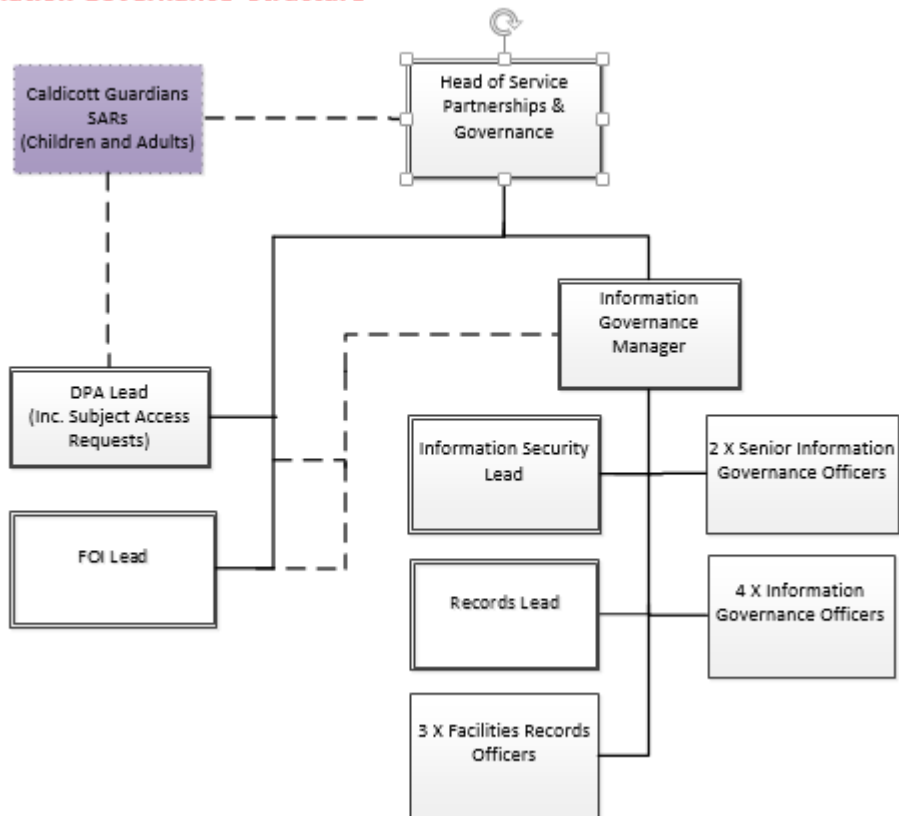
8. The lead officers are specialists within their areas and will work closely with the Head of Service, the IG Manager and the Programme Office to continue to deliver the programme.

9. The Information Governance Assurance Steering Group will continue to monitor Information Governance Risk for the Council, reporting into the Information Governance Programme Board. All IG risks are updated on a quarterly basis as part of the Corporate Performance and Risk report into Cabinet.

Records storage

10. A long term, physical records storage strategy for existing records and an electronic strategy, using SharePoint has been approved by CLT.

11. A new contract has been tendered for and let through Iron Mountain to amalgamate the current records storage agreements which the council has and provide one, secure, comprehensive and fully compliant records storage facility. This will enable a considerable improvement in Information Management compliance whilst delivering an annual saving of approximately £24k (i.e. the external contracts). At the same time it will free up buildings across the estate enabling their use to be reviewed within the strategic assets programme.

    Work is also being undertaken to scope the amount and cost of indexing records which are very likely to be required in relation to the outcomes of the Jay (Goddard) enquiry.

12. Service areas have started to identify and purge records that no longer need to be held in readiness for the transfer. Records "champions" have been identified within directorates to understand and support the new system and implement more robust retention schedules across the organisation.

Information Asset Register

13. A composite Information Asset Register to record all the council's information assets has been designed, successfully piloted and was rolled out across the organisation at the beginning of October, for completion by the Information Asset Owners (Heads of Service) by the first week of December 2016. Workshops to support this are being run during October and November.

Communications and Training Programme

14. The continued success of the improvement programme remains reliant on culture change and embedding the importance of information governance across the organisation. A communications and engagement strategy is being produced to underpin this and enhance the training delivered to date and in the future.

15. All Corporate Directors, Associate Directors and Heads of Service have now been trained in Information Governance with the assistance of external information governance experts, Dilys Jones Associates Ltd. Key members have also received this training.

16. A specification is being drawn up to enable the tender for an eLearning package that will be made available to all remaining members and staff. It is proposed that

this will be in place by the end of March 2017.

17. The Head of Service and IG Manager attend senior management team meetings to promote IG and to understand the requirements for each service areas. The IG team also deliver bespoke training to relevant service areas and will continue to promote and provide professional support and guidance across the organisation.

18. All role profiles have been updated to include generic statements concerning job responsibilities in relation to Information Governance.

Information Governance Procedures and Guidance

19. The procedures and guidance that are being prepared to underpin the IG policies will be completed by the end of October 2016. They will be published alongside the policies on the intranet on a dedicated information governance site. Version control will be managed strictly through the Information Governance Assurance Group.

Environmental Impact

20. There are no environmental impact implications.

Procurement Implications

21. Procurement guidance has been updated to support proposed changes to the Council's Procurement Rules, which include requirements for data sharing and information security. The guidance will cover the Council's obligations in respect of information governance and seeks to ensure engagement of Information Security at the point of initiation to provide the relevant safeguards for new specifications.

Equality and Diversity Impact

22. There are no equality and diversity impact implications.

Risk Assessment

23. Failure to implement improvement actions will increase the risk of non-compliance with information legislation resulting in reputational harm, litigation, fines and costs.

Financial Implications

24. The cost for the new staffing structure has been met from existing budget. The cost for the new records contract has been met through a combination of releasing capital from the cost of existing storage sites and existing revenue. Training costs have been met from the initial £50k that was identified to support this programme.

Legal Implications

25. The measures that are being taken under the Improvement Programme will ensure that the Council meets its obligations under information legislation.

Conclusion

26. Significant steps have been taken to address and rectify the findings identified by the Information Commissioner's Office (ICO) and the audit engagement with them is now complete.

27. A two year improvement and action plan has been drawn up, which goes above the ICO requirements to fully inculcate a new information governance culture and practices across the organisation, whilst ensuring compliance with statutory legislation.

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