

Wiltshire Council

Audit Committee

24 January 2017

Information Governance

Executive summary

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

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.

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. 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.
3. 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.

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

Main Considerations for the Committee

ICO Recommendations update

4. 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. Last report Oct 16	Number of actions complete, partially complete and not implemented. Current Status
Records Management	31	16 Complete 15 in progress	20 Completed 11 in progress
Subject Access Requests	27	7 Complete 20 in progress	16 Completed 11 in progress
Data Sharing	16	6 Complete 10 in progress	8 Completed 8 in progress
TOTAL TOTAL COMPLETE TOTAL IN PROGRESS	74 44 (59%) - an increase of 20% of recommendations being completed within the last 4 months 30 (41%)		

5. 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 Management

6. The project with regard to removing paper storage from sites across the County, continues to move forward. Completion is due by the end of March and is well on target. The key timings:

Monkton Park basement – all paper storage removed week ending 13th January

Churchfields (Salisbury) – all paper storage removed by 31st January

Riverway (Trowbridge)– all paper storage removed by 31st January

Devizes – removal due to start on 15th February lasting approx 3 weeks

A total of 25,645 boxes have been removed to Iron Mountain which equates to 29,278 cubic feet of space which has been released.

7. The IM Connect portal for services to retrieve files is up and running, being well utilised by staff and Iron Mountain continue to add files to the system.
8. One of the actions to arise from the ICO audit was the need to complete a review of the council's retention schedule.
9. The retention schedule contains the council's policy for how long it keeps various types of record and what it does with them once that period of retention has expired. The existing schedule is incomplete and not particularly user friendly.
10. The IG team have now contacted all services to review their parts of the retention schedule, and have been asked to advise us of any additions or amendments that need to be made to the existing schedule or to indicate where the existing schedule remains appropriate.
11. The Information Governance Team will then use the responses we receive to create a single point of reference for the council that officers can use to ensure that records are maintained and disposed of in line with a single and consistent policy.

Information Asset Register

12. 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 were run during October and November with one to one sessions being arranged where appropriate.
13. The response rate from Heads of Service for this initial phase is 77%. There has been some significant restructuring in certain areas and this is where

the focus has been. The IG team has worked with these services to ensure that support was given to encourage completion as soon as possible and for the majority of services this has been achieved. Carlton Brand in his role as Senior Information Risk Owner for Wiltshire Council has been updated with progress.

14. Information received within the register from services will now be reviewed and assessed and Phase 2 will include extracting more detail and clarification from services to ensure the organisation is able to understand and manage its assets and the risks associated with them, in order to protect the information held and exploit its potential.

PSN

- 15 In order for the Council to exchange data securely with central government and other public sector partners remain it is necessary for it to be part of and therefore compliant with the Public Services Network requirements for information security. Compliance and approval are subject to annual review, which includes penetration testing, both on the IT system itself and physical entry into buildings
- 16 NCC Group provided a detailed 417 page report, which identified several areas of concern, for both the physical and technological elements. These issues have been ranked from critical to low. Progress has been significant since last year. The critical and high issues have decreased by 29%, with an overall decrease of 3.1%. *Please note: this is across the combined Council/Police estate.*

Main Outstanding Issues

Of the 70 medium or above issues identified in the 2016 PSN penetration test, 1 critical, 2 high and 3 medium level risks remain open but are being progressed. Detailed risk plans are in place but progress has been slow due to the availability of specialist external support resources. The restructure of IT has also had an impact.

A further 10 issues have been risk accepted by CLT: 1 high and 9 medium level risks. The medium level risks are issues where the action required to remediate the risk outweighs the potential harm from the vulnerability.

SharePoint

- 17 Together with IT and the Programme Office, IG are currently developing a team site on Sharepoint which is hoped will provide a template for team sites across the organisation. The project has fallen into two distinct phases. The first phase is focusing on developing the look and functionality of a team site. Exploring what the site needs to do for each team, the visual look and feel of the site to ensure staff engagement and considering how information can be managed and stored.
- 18 It is planned that a version of the team site will be available for the IG team in late January. There will then be a period of testing the functionality. The second phase will then focus on workflow and case management.

Communications and Training Programme

- 19 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 currently being drafted to underpin this and enhance the training delivered to date and in the future.
- 20 The IG team continue to deliver bespoke training to relevant service areas and will continue to promote and provide professional support and guidance across the organisation.
- 21 Work is also being undertaken to look at requirements to train the remaining staff within the organisation, potentially through an eLearning package.
- 22 The IG team are currently in discussion with Learning & Development with regard to contributing to the Councillor Induction training being provided later in the year. Focus will be around informing Councillors of their responsibility when dealing with personal and sensitive information, how to store it, how to share it and their responsibilities around security of information.

Environmental Impact

- 23 There are no environmental impact implications.

Procurement Implications

- 24 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

- 25 There are no equality and diversity impact implications.

Risk Assessment

- 26 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

27 Work is being undertaken to ensure the budgetary transfers required from across the Authority which will cover the cost of the records contract with Iron Mountain.

There are no financial implications

Legal Implications

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

Conclusion

29 Significant steps continue to be taken and actioned to address and rectify the findings identified by the Information Commissioner's Office.

30 The IG team continues to drive both the ICO requirements and meet the demands of compiling with statutory legislation to encourage a new information governance culture across the organisation.

31 It remains key to the continuing success of the IG programme to raise the profile of IG across the organisation and to encourage both staff and managers to engage with and take responsibility for managing their information.

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