

Wiltshire Council

Audit Committee

26 January 2016

Information Governance

Executive summary

The purpose of this report is to update the Audit Committee on progress with the information governance improvement programme since the Committee's last meeting on 27th October 2015.

The improvement programme is to address the findings identified by the Information Commissioner's Office (ICO) and is underway with key actions expected to deliver within the 12 month reporting period. The next progress report will be provided to the ICO in May 2016.

The programme will also develop action plans beyond the scope of the ICO audit to further improve the council's information governance. Once improvement measures are in place their continued management will be through the Information Governance Team and the Information Governance Assurance Group.

Proposal

That the Committee notes:

- a) the progress of the improvement programme that has been set up to address the findings identified by the ICO audit report.
- b) that a further report will be submitted to the Committee in March 2016.

Reason for proposal

Report provided for information only.

Author:

Ian Gibbons, Associate Director Legal & Governance
Catherine Dixon, Portfolio Manager, Programme Office

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 ICO conducted 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 was that there is a limited level of assurance that processes and procedures are in place and delivering data protection compliance and that there is considerable scope for improvement.
3. An information governance improvement programme has been developed to address the recommendations in the ICO's report. The improvement programme is based on the NHS 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. The programme is supported by the programme office under the overall direction of Carlton Brand as the Senior Information Risk Owner (SIRO).
4. Progress with the improvement programme was reported to the Council's Audit Committee on 27 October 2015. A copy of the previous report may be found at:

[Report Information Governance](#)

[Report Appendix Information Governance ICO Summary](#)

Main Considerations for the Committee

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

Physical records storage

6. Purging of the records that were held in Chapmans building, Trowbridge was completed in July and the records that need to be retained have been transferred to the Council's storage facility in Devizes and catalogued. A paper records storage project plan has been developed to rationalise and improve the Council's physical records storage arrangements.

Information Governance Assurance Group

7. The Information Governance Assurance Group (IGAS) has been reconstituted with new membership to include the Senior Information Risk Owner (Dr Carlton Brand) SIRO (chair), Caldicott Guardians for Childrens' and Adult Care, Monitoring Officer, Head of Information Governance and the proposed information governance leads in data protection; FOI; information security and records management. New terms of reference have been agreed to ensure robust monitoring of the effectiveness of the Council's information governance arrangements.

Information Governance Policies

8. A comprehensive suite of information governance policies has been drawn up, including:

- Information Governance Framework
- Information Governance
- Privacy Impact Assessment
- Data Protection and Subject Access
- Freedom of Information
- Records Management
- Information Security
- Mobile Working
- Network Security
- Information Assets

9. The Corporate Leadership Team has approved the key overarching policies, in particular the Information Governance Framework Policy and the Information Governance Policy. The rest of the policies have been approved in principle by the Information Governance Improvement Programme Board, subject to final sign off by the SIRO.

10. Procedures and guidance will be prepared to sit under the policies and these will be published on the intranet on a dedicated information governance site. Version control will be managed strictly through the IGAS.

Restructuring of Information Governance Function

11. A proposed new structure has been developed to implement the information governance framework to sit within the Corporate Function, Procurement and Programme Office. We are working towards the new team being up and running by April 2016.

Communications and Training Programme

12. The success of the improvement programme will depend on changing the culture of the organisation so that staff have a clear understanding of the importance of good information governance, their responsibilities within their areas of operation and across the Council as a whole, and the need to discharge these diligently as an integral part of their day to day work. To this end a comprehensive communications and training programme is planned to be delivered between March and July 2016 with the assistance of external information governance experts, Dilys Jones Associates Ltd.
13. Regarding the wider scope of information governance improvements across the organisation, the Information Governance Improvement Programme will develop thematic action plans in line with the NHS Information Governance Toolkit.
14. In 2012, SharePoint was identified as a repository for digital records to replace business shared drives as well as personal drives. The IG Programme will conduct a review of SharePoint to ensure its continued relevance and compliance with information governance principles prior to rollout across the organisation from April 2016.
15. An interim report on progress was sent to the ICO in December. Any feedback received from the ICO will be reported to the meeting.

Environmental impact of the proposal

13. There are no environmental impact implications.

Procurement implications

14. Procurement guidance is currently being prepared to support proposed changes to the Council's Procurement Rules. The guidance will cover the Council's obligations in respect of information governance.

Equality and diversity impact of the proposal

15. There are no equality and diversity impact implications.

Risk Assessment

16. 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

17. A budget of £50k has been agreed to support the improvement programme, including the costs of an external information governance expert in providing consultancy support and training. The cost of the proposed new staffing structure will be met from within existing resources.

Legal implications

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

Conclusion

19. The information governance improvement programme to address the findings identified by the Information Commissioner's Office (ICO) is progressing well with key actions expected to deliver within the 12 month reporting period. The next progress report will be provided to the ICO in May 2016.
 20. The programme will also develop action plans beyond the scope of the ICO audit to further improve the council's information governance. Once improvement measures are in place their continued management will be through the new Information Governance Team and the Information Governance Assurance Group.
-