

SUBJECT:	INFORMATION MANAGEMENT UPDATE
DIRECTORATE:	CHIEF EXECUTIVE AND TOWN CLERK
REPORT AUTHOR:	BECKY SCOTT, LEGAL & DEMOCRATIC SERVICES MANAGER (LDSM)

1. Purpose of Report

- 1.1 To update the committee on the progress of information management in the Council

2. Training Programme

- 2.1 The Information Commissioners Office (ICO) set out the framework for the Council to work in to ensure compliance with the Data Protection Act 1998 ('DPA')
- 2.2 The Corporate Leadership Team in January 2017 agreed that they would monitor the progress of the training programme and take responsibility, along with the Service Managers, for its implementation. Training was accepted to be a requirement and it was noted that it would enable customers to trust us to deliver the services, and demonstrate to the ICO that the organisation was taking the protection of its data seriously.
- 2.3 The training is being included as an IMP for directorate's Performance DMT's and will be reviewed alongside the general audit and information asset audit recommendations which are now included in Service Plans
- 2.4 The Training Programme for the teams has been completed by the Information Governance Officer (IGO) through face to face meetings with them.
- 2.5 Current take up for the DP training on City People is 52%. The ICO expects this to be 100%. All asset owners have been contacted again recently requesting that they ensure completion of the training by all staff. This has also been reinforced in the IAO Training and Communications have also issued reminders to staff recently to complete the training. It is hoped that at the next IG Board/AD Group meeting on 13th September that there will be a review of those who have not completed the training and targeted requests from AD's be made through SMT's. In addition, we will be transferring the e-learning package to the new Netconsent software soon, which will be a more robust method of asking individuals to carry it out.
- 2.6 The LDSM and IGO have carried out training for members on 11th July and 2nd August 2017. Those who have not been able to attend have received the slides. In addition all members were asked to fill out a form relating to how they receive and process data to take an information asset audit and the outcomes will be reviewed and any additional action will be taken to support members in their roles given their duties to the ICO as data controllers.

- 2.7 In addition, the Training Register is well populated, principally by the IGO who has recorded every 1:1 meeting, team meeting or training session and there are now 230 rows of entries.

3. IGO Progress

- 3.1 Further to the last progress reported the IGO has done the following:-

- Continued to lead the operational work in the internal GDPR Group on the Vision 2020 Project.
- Completed the training programme for teams
- Continues to assist in implementing the audit recommendations for CLC and from East Lindsey's audit into the Revs and Bens service
- Met with 4 of the AD's to report outcome of asset audits in their area. Has contacted the remainder to arrange appointments to complete this.
- Ongoing support to all staff, finalising ISA's, reviewing all current ISA's, responding and recording breaches internally, raising awareness drafting and posting communications for the data protectors forum, assisted the LDSM in updating the action plans/training needs plan.
- Developed and issued Handbook for IAO's in relation to their role as an IAO and the changes to be made by GDPR.
- Analysed data breaches to monitor and report data breach trends internally.
- Delivered training to IAO and Members training with LDSM on the Handbook and the GDPR.

4. IG Action Plan Progress

- 4.1 The IG Action Plan is attached at Appendix A. There has been further good progress on reducing the number of red actions, now only 3. These are:-

G.8	Build Privacy Impact Assessment (PIA) process into SPIT/project management groups for new systems.	Guidance and templates have been drafted to roll out PIA's and are currently being trialled with specific service managers
R.10	Allocate responsibility for approving new Privacy Notices to the IGO or IAO. The ICO would suggest using the ICO's Privacy Notices Code of Practice for guidance on the content and consistency of new notices.	Privacy Notices to be rolled out once a view from CLT has been obtained
R.15	Document the review and weeding process for software systems storing personal data. This task should have an assigned owner and be monitored	A review of the Council's unstructured electronic files has been commissioned with a view to building an action plan for this element. Email archiving has also been considered.

5. IG Management Plan

5.1 There are some ongoing actions which have been completed through the Action Plan and which need to be monitored through this Board. This is attached at Appendix B.

5.2 This now includes the work required under the General Data Protection Regulation (GDPR). Actions required of service managers will be communicated through the Service Managers Forum. The GDPR comes into force from 25th May 2018.

5.3 The main areas to be considered are:

- ensuring privacy notices meet the new higher standards in time for GDPR implementation (stating for what purpose the data will be processed, who long it will be retained for and who it will be shared with)
- maintaining and updating our Asset Register identifying the information we hold where we hold personal data, where it came from and who we share it with.
- ensuring whether we have valid consent from customer's where required by reviewing how we seek, obtain and record consent and whether we need to make any changes to comply with GDPR.
- ensuring we can comply with the additional rights of data subjects created by GDPR including the right to have their personal data deleted.
- implementing Privacy Impact Assessments when required where personal data is being processed.
- identifying our legal basis for processing personal data and any sharing of this with Data Processors in Information Sharing Agreements and/or contracts.
- reviewing contracts with other Data Controllers/Processors to ensure they include data protection compliance clauses.
- ensuring we can comply with the shorter time scale of 1 month to respond to subject access requests and the inability following GDPR to charge for these.
- designating a data protection officer as required by GDPR and assess where

this role will sit within our organisation's structure and governance arrangements.

6. Breaches

- 6.1 Internal breaches of the DPA are now analysed by the IG Board/AD Group.
- 6.2 The Council will note that there are a number of breaches in the areas of Revenues and Benefits, however since the changes made at the time of the last report, there have been far fewer. The spike could be related to the willingness of officers to report breaches as well as raised awareness due to the nature of the confidential records they process.
- 6.3 There have been no complaints to the ICO, nor notifications by customers since the last report.

7. IAO Handbook

- 7.1 The IAO handbook has been given to the Information Asset Owners during a course held on 5th or 12th July. There is another mop-up session on 20th September 2017. This outlines all their responsibilities and has been rolled out on City People and there may be further links to it once netconsent is available to continue the embedding of this with the IAO's.

8. Strategy and Policies

- 8.1 No updates required at this time. The main policies, including the Breach Management Policy are due for review in May 2018.

9. AGS Status

- 9.1 As members will be aware the status for this has reduced from red to amber, which is largely due to the hard work of the IGO.

10. Vision 2020

- 10.1 The GDPR project is one of the Vision 2020 projects to be delivered in year 2018/19. The Working Group has been meeting monthly to ensure that we are on target with our Project Plan.
- 10.2 The IG work ensures that staff are high performing in their collection and processing of customer's data. It also assists to ensure that the Council is trusted to deliver the services, and ensures legal compliance.

11. Organisational Impacts

11.1 Finance

Nothing relevant to this report.

11.2 Legal Implications

As outlined in the report.

12. Recommendation

12.1 To note the report and specifically provide comments on the following:-

- training programme and compliance with the follow up training
- action plan progress
- progress on monitoring the actions from the asset audits and action plans

Is this a key decision? No

Do the exempt information categories apply? No

Does Rule 15 of the Scrutiny Procedure Rules (call-in and urgency) apply? No

How many appendices does the report contain? 2

List of Background Papers: None

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