

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

## **1. Purpose of Report**

- 1.1 To update the committee on information management, the Action Plan for compliance with the General Data Protection Regulation (GDPR) in force from the 25 May 2018 and the appointment to the new role of Data Protection Officer.

## **2. Training Programme**

- 2.1 Assistant Directors (AD's) have agreed that they would monitor the progress of the training programme and take responsibility, through Service Managers Team meeting (SMT's) for its implementation. Data Protection (DP) 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 Information Commissioners Office (ICO) that the organisation was taking the protection of its data seriously.
- 2.2 The Training Needs Programme for the Council has been prepared by the Information Governance Officer (IGO) and is attached as Appendix A.
- 2.3 Take up for the DP e-learning training is improving and we are working towards 100% compliance. All asset owners have been contacted directly by the IGO recently requesting that they ensure completion of the training by all staff and it has been raised at the Service Manager's Forum. This has also been reinforced in the Information Asset Owner (IAO) Training and Communications have also issued reminders to staff recently to complete the training.

## **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 and focussed on getting staff to do their e-learning module.
  - Continues to assist in implementing the audit recommendations for CLC and from East Lindsey's audit into the Revs and Bens service
  - Met with all of the AD's to report outcome of information asset audits in their

area.

- Ongoing support to all staff with DP and GDPR queries, which have increased due to awareness. Finalising Information Sharing Agreements (ISA's), reviewing all current ISA's, responding and recording breaches internally, raising awareness, drafting and posting communications for the data protectors forum and City People, 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's and Members with LDSM on the Handbook and the GDPR.
- Preparing an IAO Checklist to roll out to IAO training in the new year to all the IAO's
- Developed links with Boston Borough Council, West Lindsey, North Kesteven and South Kesteven regarding DPO role and implementation of action plans.
- Following up the audit recommendations required to ensure information on IMP's is being actioned.
- Keeping up to date with the internal moves within teams.
- Working with Service areas to implement retention and disposal policies

#### **4. GDPR Action Plan Progress**

4.1 The GDPR Action Plan is attached at Appendix B.

#### **5. GDPR Fee Structure**

5.1 It is expected that the fees payable to the ICO will be in the region of up to £1000 per year, an increase of £500, this is understood to assist the supervisory body to enforce the GDPR.

#### **6. Breaches**

6.1 There has been a decrease in numbers of breaches reported, and in particular to note is that since the Benefit notifications have been outsourced since September 2017, there have been no data breaches in this area. This is partly as a result of the work of the Information Governance Officer with senior managers on a solution.

6.2 There have been no complaints to the ICO, nor notifications by customers since the last report.

## **7. Strategy and Policies**

- 7.1 The Information Governance Strategy is due to be reviewed by November 2017, however we are proposing to delay this to incorporate all government guidance and include it in the full suite of DP policies which will be amended soon. It is hoped that these will be reviewed by Policy Scrutiny Committee on 20 March 2018 for comments and taken to Executive on 26 March 2018. This will then allow us to publicise them in time for the GDPR.

## **8. Communications Plan**

- 8.1 Please find attached 6 month communications plan for countdown to GDPR on the 25 May 2018 at Appendix C.

## **9. Data Protection Officer role**

- 9.1 CMT received comments made by this Committee alongside a report on the role and has confirmed that funding will be made available to recruit an officer for this important post. Once the job has been evaluated, hopefully before Christmas, this process will be undertaken.

## **10. AGS Status**

- 10.1 The AGS status for the Information Governance section is now amber.

## **11. Vision 2020**

- 11.1 The GDPR project is one of the Vision 2020 projects to be delivered in year 2018/19. The Working Group meets monthly to ensure that we are on target with our Project Plan.
- 11.2 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.

## **12. Organisational Impacts**

### **12.1 Finance**

The funding for the DPO role will come from existing budgets.

### **12.2 Legal Implications**

As outlined in the report.

## **13. Recommendation**

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

- Training Needs Plan
- The GDPR Action Plan
- Communications Plan

**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?** 3

**List of Background Papers:** None

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