

**Council Performance and Management Information Report – Annex One**  
**Additional information in relation to the Information Governance (IG) Internal Audit**

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1. Since the Internal Audit on Information Governance was completed in November 2015, we have planned and completed numerous actions to improve our compliance with Information legislation and best practice.
2. This annex provides a summary of the action taken and remaining actions to be completed. For information regarding our current Information Governance (IG) performance, please refer to Council paper C26(16).

**Policy and Procedural Framework**

3. We are in progress with establishing a permanent Compliance Manager position and this has been approved at a recent Senior Management Team meeting.
4. We are developing an overarching organisational approach to the management and governance of our information. The action plan details specific dates and deliverables, so that we can measure progress and outcomes of our IG work. The action plan is reviewed on a regular basis and is managed by the Compliance Manager and overseen by the Head of Governance.
5. There has been considerable work to ensure that all employees are clear they are responsible for practising good information governance and for understanding what that requires in relation to their own role – including in monthly Toolbox Talks briefings and e-learning training. We are ensuring that new employees complete the e-learning and have organised a mechanism for new employees to start attending IG toolboxes (which outline the operational procedures expected of them) within their first month of employment.
6. As part of our policy review work, we have reviewed our current IG policies against current legislation and plan to combine the existing policies into four key policies, which will outline our approach and include procedural/operational instructions for all employees and members. We have reviewed the policies in all areas and plan to combine those which relate to local IG processes into the main four policies – to ensure consistency and reduce duplication. These will be reviewed and approved at the same time – to ensure a consistent message in implementation. This is core to developing an overarching organisational approach to the management and governance of our information. The Toolboxes are an additional learning tool for the procedural instructions and all processes included in the toolboxes will be consistent with those included in the IG policies. We prioritised the Toolboxes to ensure that employees were aware of their responsibilities and key processes regardless of whether a formal policy

had been agreed and to ensure all employees had a handy reference guide to aid implementation.

7. We have designed and are trialling a simplified Impact Assessment screening tool which covers all elements of impact – corporate, IG, privacy, equality and human rights. This is a creative way to ensure that specific risks are considered and reviewed throughout a project or policy’s lifespan. This approach will take some time to embed, however it has been received very positively and users who have trialled it have noted that it was a beneficial exercise to complete and has helped them to ensure all aspects of risk are considered.
8. We expect to complete all of the work to develop the Policy and Procedural Framework by the end of August 2016.

### **Employee, Member and Other Knowledge, Training and Support**

9. An IG training needs analysis has been completed, which highlights the difference of knowledge requirements in different roles throughout the GOC.
10. Mandatory E-learning training has been delivered to all employees for IG basics. This is scheduled to be delivered to all members in June 2016. The training contains an assessment element (which means the training cannot be completed without passing the assessment) and the results are viewable by the Compliance Manager. This e-learning will be completed annually by employees and members as refresher training.
11. The training records have been sent to HR, who will upload the information onto each person’s record on the Sage system.
12. An induction on IG has been developed and delivered to new case examiners. All new employees and members will receive this induction within three months of joining the GOC (employees expected to be within first few months). All new employees and members will complete the e-learning basic training and new employees will attend the IG Toolbox Talks (which outline the operational procedures expected of them) until they have completed all of the talks (run once a month on a rolling basis).
13. The training needs analysis has shown that further training is required for Information Asset Owners, SIROs and DPOs, and the same online provider will be used, as well as face to face/small group meetings with the relevant roles and the Compliance Manager to further develop understanding.
14. We expect to complete all of the work to develop and implement the Training programme by the end of August 2016.

### **Employee Understanding of IG**

15. In delivery of the training programme, in particular the Toolbox Talks, we have focused on employee's personal responsibilities. The Compliance Manager completes regular compliance checks relating to the key policies and practices once they have been clearly communicated through the toolbox briefings (for example, clear desks, wearing of identity badges and locked printing), and reports these to the Head of Governance. Positive compliance is being rewarded at team and individual level with chocolates and positive praise. Non-compliance is taken up with line managers and Directors to encourage completion.
16. We plan to develop an IG employee survey in July 2016 to check knowledge and understanding in an engaging way.
17. The Impact Screening Tool will help to cement the understanding of IG within the workforce, as well as develop employee consideration of IG issues relating to projects and policies.
18. The Compliance Team will ensure that new policies are communicated appropriately, and support these with team briefings or mandatory toolbox talks, as appropriate. However it is anticipated that the briefings provided to-date will cover the majority of the content in the policies, so implementation should be reinforcing already understood processes.

### **Update of Prior IG Project**

19. The Compliance Team have completed a post-project evaluation of the IG Project and the BDO audit report, and any outstanding actions and risk exposure areas have been included within the IG action plan.
20. In summary, the findings were that there is now a better understanding of the importance of IG compliance – not only to complete our role of protecting the public better but also to ensure that we are compliant with the legislation and protect people's rights. The Executive is aware of the significant changes that the General Data Protection Regulation will bring and the seriousness of ensuring that we handle data appropriately and are keen to progress actions to ensure we reach a steady state which is compliant and committed to keeping information safe.
21. We plan on completing a short lessons learned exercise in December 2016 acknowledging the successes of the 2013/14 project, plus the work undertaken in 2015/16 to identify any objectives not achieved and possible reasons why.

### **Project Methodology Framework**

22. Work is underway to ensure that sufficient care is taken throughout the project process to embedding a culture which considers IG as a key risk to any project. Please refer to paragraphs seven and 17 regarding progress with the Impact Screening Tool which will be used to inform an impacts section on all business case and scope statements.
23. We plan on developing project management guidance to ensure that impact assessments are completed and taken into account in approval, IG risks are reviewed and maintained throughout project lifecycle and a post project evaluation assessments is completed on all projects, including consideration of any IG lessons by September 2016.

### **Office Move and CRM projects**

24. The assessment of physical IG controls in the new office has been completed and the majority of actions have been completed. These include door keys, ID badges, locking of rooms and cupboards, clear workstations, locked printing, key locks, review of post system and visitor policy. These processes have ensured that the majority of physical risk areas have been addressed. The remaining actions (included on the IG action plan) are focussed on embedding the policies and ensuring compliance – which is steadily improving through raised awareness and training.

### **Measures taken to ensure all parties are aware**

25. Creating the Information Asset Register is a large piece of work which is underway. We have held a number of individual and group sessions to gain feedback and frequently asked questions, before starting the main piece of work to populate the register. This stage is important to ensure that we explain the purpose, method and use of an information asset register to all levels of the organisation in a way that is understood and means the register will be a useful tool.
26. Information Asset Owners have been identified and will complete e-learning training in June-July 2016.
27. We plan on finalising and publishing the Information Asset Register by September 2016, however this is largely dependent upon the engagement by IAO's with competing work priorities.

### **Monitoring and Assessing**

28. We have completed a large number of toolbox briefings and training, which has helped to identify areas of weakness in our IG compliance. As compliance issues arise they are being considered and processes established to ensure compliance, which are then discussed at the next toolbox session to ensure

they are picked up quickly. In compiling the Information Asset Register it is likely that we will identify further areas of IG compliance requiring attention in relation to retention, disposal and processes. The Compliance Manager will continue to progress this work and incorporate any findings into the action plan.

29. We plan to assess understanding/impact of the new approach (via staff surveys and training assessments) and monitor compliance with requirements via compliance checks which are currently being trialled for key policies or operational processes. For example, measuring the implementation of locked printing, ID badges, clear workstations compliance – see paragraph 15.
30. The Compliance Manager and Performance and Planning Manager are working closely to identify relevant performance indicators.