Update for the Audit Committee (Dec 2013):
Information Governance Project

Lynn Ball SIRO

Following a number of breaches of the Council's statutory duty to keep people's personal information secure, the Council was required to sign 'undertakings' (a formal commitment to implement improvements) with the Information Commissioner. As part of the Information Commissioner's Office's (ICO) follow-up, the Council's compliance with the Data Protection Act 1998 was audited during July 2013. The audit looked at three scope areas, which were likely to present risks to the security of personal information:

- Data Protection Governance
- Records Management
- Security of Personal Information

Over 100 recommendations were made within their report. In response to these recommendations the Authority has identified actions to be delivered under five key themes:

- Theme 1 - Policies & Strategies
- Theme 2 - Communication, Training & Guidance
- Theme 3 - Records Management
- Theme 4 - Access to Buildings, Information and Third Parties
- Theme 5 - Governance (Ownership) / Reporting Procedure

It is important to note that work is underway to ensure that this *'DPA Action Plan for Improvement'* incorporates all previous regulatory activity in this area; so we will be delivering against the one action plan.

The *Information Governance Project Board*, part of the Council's *Business Transformation Programme* will be the vehicle for delivering this action plan.

Serious breaches of the DPA can result in heavy monetary penalties (up to 500k) and reputational harm. In addition, the ICO's audit will be repeated in the near future, and failure to implement change could result in enforcement action being taken against the Council.

There is no doubt that the implementation of the ICO's recommendations will mitigate against the risks of a serious breach of the Act.

Progress to date:

- Capacity has recently been awarded to project for ICT, HR and DP/Legal support
- The action plan started on the 1st November.
- Four key policies have been prepared and approved at SLT : Data Breach; PIA; Personal Data Classification Policy (will need work from the services); Information Risk
- Next Project Board : 6th December - progress against the actions is being collated and reported, and an update form this meeting will be provided verbally to the Audit Committee