

## ISLE OF ANGLESEY COUNTY COUNCIL

COMMITTEE:	Audit Committee
DATE:	23 September 2014
TITLE OF REPORT:	Data Protection and Information Governance – Progress Update
REPORT BY:	Head of Council Business / Monitoring Officer
PURPOSE OF REPORT:	For Information

### 1. Background:

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 (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
- Records Management
- Security of Personal Data

Over 100 recommendations were made. In response, the Council devised an agreed Action Plan 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 Procedures

### 2. Information Governance Project Board

As reported to the Audit Committee in December 2013, it was the work of the Information Governance Project Board to deliver the Action Plan. The work of the Board began on 1<sup>st</sup> November 2013 and ended on 4<sup>th</sup> September 2014.

The Policies and Strategies required have all been drafted, consulted upon and rolled out. They are available on MonITor at <http://monitor.anglesey.gov.uk/corporate-resource/information-governance-data-protection/data-protection/data-protection-policy-information-on-security-policies-and-related-documents/>

In addition, the attached Highlight Report provides the details of all the activities achieved during the Project. These will be reported to the ICO when his team returns during the week commencing 13.10.14.

### **3. What Next?**

A new group, called the *Corporate Information Governance Board*, will now take over responsibility for any "loose-ends" remaining from the Project Board, and will ensure that the Council continues to monitor and improve the standard of its information governance. Terms of Reference, a work programme, membership and meeting dates have been fixed for 2014/15.

Training events have been programmed for the next few months with the Information Asset Owners (the Heads of Service) receiving training on 3.10.14 and mandatory sessions for all staff during October, November and December 2014.

In addition, the Council now has a framework to corporately monitor information governance issues. The SIRO has overall responsibility for this and will receive quarterly reports on key performance indicators, data breaches and progress on the Corporate Information Asset Register, including the identification and re-assessment of risk. The SIRO will produce an Annual Report which will be reported to the SLT and the Executive and will provide assurance that the Council is proactively mitigating information risk, in a way which meets its legal obligations and its operational needs.



## Project Highlight Report

### 10<sup>th</sup> September 2014

<b>Project Title:</b>	<b>Information Governance</b>	<b>Project Start Date:</b>	<b>1<sup>st</sup> November 2013</b>
<b>Project Lead:</b> <i>(e.g. HoS/Manager)</i>	<b>Lynn Ball</b>	<b>Project Expected End Date:</b>	<b>31<sup>st</sup> August 2014</b>
<b>Project Manager:</b> <i>(include contact details):</i>	<b>Laura James-Mowbray</b> <a href="mailto:ljmed@anglesey.gov.uk">ljmed@anglesey.gov.uk</a>	<b>Reporting Period:</b>	<b>25/07/2014 – 01/09/2014</b>

**RAG STATUS KEY:**

**Red** – Definite problem identified and to be addressed;

**Amber** – Potential problems have been identified;

**Green** - This element of the programme/project is currently okay

<b>1</b>	<b>Overall Status</b> <i>[This is the mechanism that the Project Manager uses to show <u>their</u> assessment of how the project is progressing.]</i>	<b>A</b>
1.1	<p>Of the 64 activities listed on the project plan in its entirety, all activities are now either completed or in progress, however as the project has formally come to an end with actions outstanding although not showing definite signs of problems in completing those outstanding (red status), the project does require to be in an amber status as a result of this. The last board meeting took place on the 4<sup>th</sup> September 2014 where the Terms of Reference and Work Plan for the new board were agreed.</p> <p><b>Completed to date:</b> 54 (8 since the last report on the 24<sup>th</sup> July 2014)</p> <p><b>In progress:</b> 10</p> <p>Actions needed to sign off those outstanding:</p> <ol style="list-style-type: none"> <li>1. Return date for all departmental signed confidentiality register by staff (1.13) was due by the 8<sup>th</sup> September; only two received to date namely Transformation and HR.</li> </ol> <p><b>Support Required:</b> SLT to request these urgently in light of the ICO's return in 32 days, suggested deadline date Monday 29<sup>th</sup> September.</p> <ol style="list-style-type: none"> <li>2. Release of the HR bulleting (anticipated release w/c 22<sup>nd</sup> September) referring to the requirement in next PDR's for managers to explore individuals' understanding of the DPA policy and its impact on their roles. (1.15)</li> <li>3. Confirmation of logistics around the PIA training for PM's on the 30<sup>th</sup> September asap (2.7)</li> <li>4. Confirmation of training to members during the Charitable Trust on the 11<sup>th</sup> November asap (2.9)</li> <li>5. Photographic evidence of a clear 'Ysgol y Graig' pending completion on the 26<sup>th</sup> September (3.4/6)</li> </ol>	



	<p><b>6. Completion of Economic Development onto new dual use swipe cards (4.3)</b>  <b>Support Required:</b> SLT to ensure this is progressing with urgency, a deadline date for completion needs to be set.</p> <p><b>7. Do's and Don'ts guidance regarding accessing e-mails from personal devices to be sent to all staff via Y Ddolen (w/c 22<sup>nd</sup> September) with guidance on how to access MonITor remotely and a copy of both the e-mail policy and ICT security policy. (4.11)</b>  <b>Support Required:</b> SLT to accept (or decline) risk of staff accessing work e-mails and associated downloadable documents onto personal devices.</p> <p><b>8. Formal appointment/designation of DPO role required to sign off, deadline date for completion is required. (5.1)</b></p> <p><b>9. Formal assignment of the security brief required to sign off, deadline date for completion is required. (5.2)</b>  <b>Support Required:</b> SLT to agree assignment</p> <p><b>10. Clear desk policy to be circulated to all staff via Y Ddolen (w/c 22<sup>nd</sup> September)</b>  <b>Support Required:</b> SLT to sign off Clear Desk policy for circulation</p> <p>The following actions (not discussed above) have been passed onto the Terms of Reference and/or Work Plan (appendix 1.) for the new replacement Information Governance Board. As indicated below:</p> <p><b>RT 4.7</b> ICT – Audit of permissions, currently 40% complete, end date of 30<sup>th</sup> September 2014 amended at last project board meeting to reflect progress to date and is now agreed as the end of May 2015.</p> <p><b>RT 3.1 / 3.2</b> CIO - Completion of draft Corporate Information Assets Log and Retention Schedule (to include introduction) is required to present to the ICO on their return for guidance/confirmation of suitability, end date agreed as 08/10/2014</p>
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<b>2</b>	<b>On Budget</b>		<b>G</b>
2.2	The percentage over or under budget is: 0%	The amount over or under budget is:	

<b>3</b>	<b>On Time</b>		<b>A</b>
3.1	<p>The project was scheduled to complete on the 31<sup>st</sup> August 2014, there are a few of actions that although largely complete may be being held up by minor requirements of assurance i.e. photographic evidence, staff communication etc. The actions that will complete outside of this date are discussed in 1.1 above.</p> <p>With these in mind it is estimated that the project will be fully complete by the 29<sup>th</sup> of September (with the exception of point 6, 8 and 9 which require deadline dates) of, which will be – 29 days.</p>		

<b>4</b>	<b>Key Activity This Period</b>		<b>A</b>
	<p>Over half of the activities within this period were not completed on-time. This is however not down to lost momentum, but moreover awaiting decisions and communication opportunities in order to complete.</p> <p>Elements completed and progress made include:</p>		



- ✓ 300 boxes of Legal files have been transferred to Anglesey Archives
- ✓ Finance have 900 boxes identified for shredding and 600 that must be kept. There are also an additional 170 boxes in 2 containers that need to be kept. Property is looking for a suitable location where these can be securely stored, managed and destroyed by the service when the destruction dates are attained.
- ✓ Children services are in the process of moving their 170 boxes of files from their container to Anglesey Archives where they will be prepared for archiving.
- ✓ Information Security Policy made available on MonITor
- ✓ Corporate E-mail policy made available on MonITor
- ✓ MFD Policy made available on MonITor
- ✓ An approved Training/Support framework and roll out timeline to include DPA training for all staff, PIA training for Project Managers, supporting the Records Management Policy, Training package for Members etc.
- ✓ Communication regarding the training dates and locations undertaken
- ✓ 470 members of staff to date have booked onto the 1 hour sessions
- ✓ 22 members of staff (IAO and Compliance officers etc.) have booked onto the full day course
- ✓ A separate course has been scheduled for 60/70 leisure centre and library staff for the 17<sup>th</sup> December.
- ✓ Paragraph relating to staff responsibility for DP drafted and passed for inclusion in JE negotiations, this statement will be included in all NEW job descriptions moving forward.
- ✓ Internal Audit agreed to check access logs of most sensitive systems for ICT as part of their yearly audit plan.
- ✓ On-line acceptance passed to DCE to progress via the group responsible for preparations in advance of the February Corporate Assessment.

Project Management:

- ✓ Lessons Learnt Log finalised at 04/09/14 meeting
- ✓ Updated web pages (MonITor)
- ✓ Messages released on Y Ddolen for staff
- ✓ Comprehensive assurance document complete (pending completion of actions discussed in 1.1)
- ✓ Further project related posters finalised and in circulation
- ✓ ToR and Work Plan for replacement board agreed at 04/09/14 meeting
- ✓ Stickers for removable media (phones/i-pads/laptops) and for printers/faxes etc. created and printed.

<b>Project Lead Name:</b>	Lynn Ball	<b>Date:</b>		<b>Additional Comments:</b>	
<b>HoS Name (if different from Lead)</b>	N/A	<b>Date:</b>	N/A	<b>Additional Comments:</b>	N/A

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<b>HoS Name (if different from Lead)</b>	N/A	<b>Date:</b>	N/A	<b>Additional Comments:</b>	N/A