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Audit & Procurement Committee  
Cabinet Member for Policy & Leadership

25 July 2016  
28 July 2016

**Name of Cabinet Member:**

Cabinet Member for Policy & Leadership – Councillor Duggins

**Director Approving Submission of the report:**

Executive Director of Resources.

**Ward(s) affected:**

All

**Title: Information Management Strategy Update**

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**Is this a key decision?**

No

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**Executive Summary:**

The Council's Information Management Strategy was approved by Cabinet in March 2016. Information Management is becoming increasingly critical to the way the public sector does business as we integrate services, seek to gain better outcomes with fewer resources and digitalise the way services are delivered. Information is one of our greatest assets and its usage is a major responsibility. We are ambitious to be a Council that is trusted by its citizens and customers to manage and protect their information. The Information Management Strategy will ensure that we exploit information as a strategic asset, using recognised best practice, legislation and technology to minimise requests for information and maximise the opportunities of information intelligence to share future services and evaluate the effectiveness of existing ones.

One of the work streams within the strategy relates to information governance and data protection. In order to understand the level of maturity/assurance in relation to information governance across the organisation, the Council arranged for the Information Commissioner's Office (ICO) to conduct a data protection audit. Information Management specialists were also engaged to conduct a Council wide maturity assessment. These exercises have helped formulate action plans for the Council to improve its information management arrangements. This report sets out the findings of the audit and maturity assessment, the actions identified and progress against those actions to date.

**Recommendations:**

Audit and Procurement Committee is recommended to:

- (1) Note the outcome of the ICO Audit and In-form Consult Maturity Assessment;
- (2) Note the progress to date on the ICO Audit and Maturity Assessment Action Plans
- (3) Request that Officers bring a further report to the Committee on the outcome of the follow up audit by the Information Commissioner;
- (4) Make any other recommendations to the Cabinet Member that the Committee considers appropriate.

Cabinet Member for Policy & Leadership is recommended to:

- (1) Consider any recommendations from the Audit and Procurement Committee.
- (2) Note the outcome of the ICO Audit and In-form Consult Maturity Assessment;
- (3) Note the progress to date on the ICO Audit and Maturity Assessment Action Plans
- (4) Request that Officers bring a further report to the Committee on the outcome of the follow up audit by the Information Commissioner;
- (5) Make any other recommendations that the Cabinet Member considers appropriate

**List of Appendices included:**

Appendix 1 – ICO Audit Executive Summary

Appendix 2 - ICO Audit Action Plan

Appendix 3 – Inform Consult Maturity Assessment & Road Map.

**Other useful background papers:**

None

**Has it been or will it be considered by Scrutiny?**

No

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

Yes

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**Will this report go to Council?**

No

**1. Context (or background)**

- 1.1 The Council's Information Management Strategy was approved by Cabinet in March 2016. One of the work streams within the strategy relates to information governance and data protection. Through the Don't Gamble with Data Campaign, the Council has worked hard to raise employee awareness of responsibilities of data protection and information governance. All staff must complete mandatory data protection training and use 'locked print.'
- 1.2 To assist with the development and delivery of the Council's Information Management Strategy (which was approved by Cabinet in March 2016), Officers thought it would be helpful to understand the state of information governance across the Council so that improvement actions could be identified.
- 1.3 In October 2015, the Information Commissioner conducted a data protection audit of Children's Social Care and Revenues and Benefits. The audit considered governance arrangements, training and awareness and data sharing arrangements. The Auditors met with the Senior Information Risk Owner (SIRO) the Acting Monitoring Officer, the Caldicott Guardian, the Assistant Director for ICT, Transformation and Customer Services as well as managers and officers within the two service areas. A copy of the ICO Audit Executive Summary is attached at appendix 1.
- 1.4 The ICO Audit concluded that the Council has "very limited assurance that processes and procedures are in place and deliver data protection compliance."It is important to note that the audit provides only "a snap shot" of assurance levels at the time of the audit. It took limited account of the Council's strategic aims and direction of travel, which are in place and in the process of being implemented. The audit did also identify the key policies in place, the development of a toolkit/handbook for employees and the communications campaign as areas of good practice.
- 1.5 The Council has considered the ICO's recommendations and included these within the action plan attached to this report as appendix 2. Out of 77 actions, 8 have been completed, 50 are in progress and 19 are still to be commenced. The majority of these are dependent on the completion of other actions.
- 1.6 The ICO will conduct a follow up audit towards the end of 2016/early 2017 to assess progress against the recommendations. The Council is well on track to have implemented the majority if not all of the actions in advance of this audit. By implementing these actions, the Council will significantly increase its assurance rating.
- 1.7 Since the scope of the ICO Audit was relatively limited and in order to refine the entire approach to how the Council manages and uses information effectively, the Council proactively engaged Information Management Specialists, In-Form Consult (IFC) to conduct a maturity assessment of information management arrangements across the Council.
- 1.8 IFC assessed the Council's maturity level as low-medium. Across the areas considered maturity was either at a formative (level 2) or developing stage (level 3) with level 1 being the lowest and 5 being the highest. IFC consider the maturity assessment to be a cause for optimism and not unlike similar local government organisations and no area scored a

lowest level of 1. This demonstrates that we already have a good basis to work from and gives confidence we will be able to progress quickly in transformation our approach to information.

- 1.9 IFC used the maturity assessment to create a roadmap/action plan identify key work streams and activities required to implement the Council's vision for information management. There is some overlap between the activities' identified by IFC and the ICO audit. A copy of the road map is attached at Appendix 3.

## **2. Options considered and recommended proposal**

- 2.1 The Council will continue to deliver the Information Management Strategy as approved by Cabinet. The implementation of the actions identified by the ICO Audit and IFC maturity assessment form key elements of the strategy. Information is one of our greatest assets. We need to exploit information as a strategic asset to shape future services and evaluate the effectiveness of existing ones
- 2.2 The Strategic Management Board is committed to delivering the Information Strategy, which is at the heart of the Council's transformation plans. The Information Management Strategy Group oversees the way that information is managed across the Council and will oversee progress of the ICO and IFC action plans. The Group is chaired by the Executive Director of Resources who is also the Council's Senior Information Risk Owner and has senior representation from each directorate including the Chief Information Officer (Assistant Director ICT Transformation and Customer Services), ICT, Transformation, Insight Team and Legal Services. The Executive Director of People is the sponsor for the Information Management Strategy.
- 2.3 It is essential that systems and arrangements are in place to ensure compliance with all legislative requirements concerning the use of information. Implementation of the ICO and IFC actions will ensure that the Council improves its assurance levels in this regard.
- 2.4 It is not an option for the Council to do nothing. Failure to implement the actions identified will put the Council at increased risk of breaching its obligations under the Data Protection Act 1998. It would also inhibit the Council's ability to maximise its use of data to deliver value for money, customer focused services to the benefit of its customers.

## **3. Results of consultation undertaken**

- 3.1 There is no requirement for the Council to consult on the implementation of the actions identified.

## **4. Timetable for implementing this decision**

- 4.1 The actions are already being implemented. The Council aims to complete the actions identified as part of the ICO Audit prior to the follow up audit, which is anticipated at the end of 2016/early 2017. The IFC recommendations are also being implemented. These will be delivered over the next 12 – 15 months.

## **5. Comments from Executive Director of Resources**

### **5.1 Financial implications**

This programme of work is being delivered from existing resources. The implementation of the Information Strategy acts as a key enabler to a number of key Council projects and will be aligned with the savings programme and budget report which underpin much of the work already planned to deliver existing targets in the Medium Term Financial Strategy. Implementing the recommendations from the ICO reduces the risk that the Council will receive a monetary penalty in the event of a breach of the Data Protection Act 1998.

### **5.2 Legal implications**

The adoption of an overarching Information Management Strategy represents good governance. The implementation of the actions identified promotes compliance with the Data Protection Act 1998 and will improve safeguards against data breaches.

## **6. Other implications**

*Any other specific implications*

### **6.1 How will this contribute to achievement of the Council's Plan?**

Improved use of data and information will contribute to the Council's overall aims and objectives in the Corporate Plan by underpinning key components of the Council's transformation and efficiency agenda.

### **6.2 How is risk being managed?**

Risk will be managed through gaining a better understanding of the data assets the Council holds and their specific security and risk implications. The formation of an Information Asset Register will give greater visibility to those risks; identifying the owners and enabling better management of risk.

### **6.3 What is the impact on the organisation?**

A more strategic approach to the management and use of information, will lead to improved decision making through benefits including:

- more effective safeguarding of children through improved data sharing with different public agencies
- Efficiency savings from having single data sets of information, less duplication and risk of error.

### **6.4 Equalities / EIA**

The approach set out in the Information Management Strategy does not have any specific impact on the Public Sector Equality Duty. However, management of personal and equality data is included within the scope of the strategy. As a result, the improved management of data will lead to improved understanding of the equality impact of future decisions.

## 6.5 Implications for (or impact on) the environment

There are no specific implications or impact upon the environment.

## 6.6 Implications for partner organisations?

The Information Management Strategy applies to all data and information that the Council creates, owns, collects and holds in any format. The benefits derived from improved information management and the implementation of actions relating to data sharing will apply to partner organisations.

### Report author(s):

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