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Audit and Procurement Committee

24 October 2016

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership – Councillor Duggins

**Director Approving Submission of the report:**

Executive Director, 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 to 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 and 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 (In-Form Consult) 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.

An update on these action plans was shared with Audit and Procurement Committee and the Cabinet Member for Policy & Leadership in July 2016, and this report provides a further update on progress to date. Overall the Project team are forecasting that all actions will be complete sufficiently in advance of the return review of the Information Commissioner's Office in March 2017.

Implementation of the ICO recommendations will leave the Council in a very strong position, and ahead of most local authorities in terms of compliance with data protection requirements.

**Recommendations:**

Audit and Procurement Committee is recommended to:

1. Note the progress to date against the ICO and In-Form Consult action plans
2. Request that Officers bring a further report back to the Committee on the outcome of the follow-up audit by the Information Commissioner
3. Make any additional recommendations that the Committee considers appropriate

**List of Appendices included:**

Appendix 1 - Progress made against the actions

Appendix 2 – Progress made on ICO Audit recommendations

**Background papers:**

None

**Other useful documents:**

*Report to Audit & Procurement Committee on 25 July 2016*

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=553&MId=11087&Ver=4>

*Report to Cabinet Member for Policy & Leadership on 28 July 2016:*

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=562&MId=11049&Ver=4>

**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?**

No

**Will this report go to Council?**

No

## **Report title: Information Strategy Update – October 2016**

### **1. Context (or background)**

- 1.1 The Council's Information Management Strategy was approved by Cabinet in March 2016. A key work stream of that strategy focuses on information governance and data protection. To understand the Council's maturity in relation to information governance, the Information Commissioner's Office (ICO) undertook an audit in relation to data protection arrangements and industry specialists In-Form Consult (IFC) conducted a maturity assessment across the Council in relation to Information Governance generally.
- 1.2 The ICO audit looked at a snapshot in time, and consulted with Senior Managers and Officers in Revenues and Benefits and Children's Social Care. The audit concluded that the Council has 'very limited assurance that processes and procedures are in place to deliver data protection compliance' and recommended a series of actions for the Council to implement to improve.
- 1.3 The ICO will conduct a follow up audit in March 2017 to review progress against those recommendations.
- 1.4 The separate 'maturity' assessment conducted by IFC considered the whole of the Council, and took account of the direction of travel and the Council's wider strategic aims. This maturity assessment was wider in scope than the ICO audit, and considered all aspects of Information Management. IFC assessed the Council's level of maturity as low-medium, which is comparable with other similar local government organisations. This assessment gave a further set of recommendations to complement those from the ICO and the improvement journey from an information governance perspective, but also ensuring that the Council is able to treat its data and information as an asset and get the maximum value from it.
- 1.5 The report to Audit and Procurement Committee on 25<sup>th</sup> July 2016 gave an update on progress against both of these action plans, and this report provides a further interim update of progress ahead of the ICO's planned follow up audit in March 2017.

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

- 2.1 The report to Audit and Procurement Committee on 25<sup>th</sup> July 2016 detailed how out of 77 actions from the ICO recommendations, 8 had been completed; 49 were in progress, and 20 were yet to begin.
- 2.2 Since then a further 38 have been completed and work is now well underway against 27 of the remaining 31 actions, and we are projecting that all actions will be complete significantly in advance of the return visit in March 2017. This will enable sufficient time for those changes to have had impact and embedded into the practice of the organisation.
- 2.3 There are still 4 actions which have yet to begin. These actions represent the final stages of the plan and were dependent on other actions being completed before they could commence. In order for these actions to be completed, a Records Manager is required in the Information Governance Team, and this position is now being recruited to.
- 2.4 Details of progress made against the actions is included in appendix 1.

- 2.5 Since the meeting of 25<sup>th</sup> July 2016, some significant milestones have been achieved. In particular the review of policies and guidance has been completed and assembled into a 'handbook' to act as a single access point for staff across the council. The handbook will be launched at the Council's 'Data Day' event on 19<sup>th</sup> October 2016. The mandatory e-learning on data protection has also been updated to include data and information sh. It is anticipated that this will be launched together with a requirement that all staff complete it annually by the end of October.
- 2.6 The 'Data Day' will bring officers from across the council, at all levels, together to discuss the importance and the power of data and information and is a significant opportunity to communicate with staff to impress the importance of good information management practice, and to ensure that risks and opportunities are better understood and managed.
- 2.7 The completion of the ICO recommendations will see us take significant strides to improving our information security and data protection compliance, but the Information Management Strategy sets out our ambition to go beyond those recommendations. The strategy aims to ensure that we leverage the power of data and the opportunity this gives us alongside the Digital Strategy to improve efficiency, customer experience and our ability to work with partners.
- 2.8 The In-Form Consult maturity assessment was intended to provide us with a road map to look beyond the ICO activities, and whilst there were many common themes with the ICO findings, it recognised this ambition and the direction of travel as we start to consider new tools and techniques for storing managing and processing data.
- 2.9 Those recommendations will be implemented over the next 12 months and will form an ongoing basis to ensure we are able to keep abreast of new developments in the digital age to ensure that information remains secure in new media and new technology, and will future proof and safeguard us into the future, ensuring we remain in the strong position that the ICO recommendations will leave us in.

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

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

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

- 4.1 The actions are already being implemented. The Council aims to complete the actions from the ICO recommendations by the end of the calendar year, ahead of the ICO's revisit in March 2017.
- 4.2 The IFC recommendations will apply on an ongoing basis and many will follow from the ICO recommendations as we look to build on the strong position that those actions should leave us in.

### **5. Comments from Executive Director, 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 over-arching 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**

### **6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?**

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 on 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.

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