

---

Audit and Procurement Committee

20 February 2017

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership – Cllr George Duggins

**Director Approving Submission of the report:**

Executive Director, Resources

**Ward(s) affected:**

All

**Title: Information Management Strategy Update**

---

**Is this a key decision?**

No

---

**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 for 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.

Updates on these action plans were shared with Audit and Procurement Committee and the Cabinet Member for Policy & Leadership in July 2016 and October 2016, and this report provides a further update on progress to date.

**Recommendations:**

Audit and Procurement Committee is recommended to:

1. Note the progress to date against the ICO action plan

2. Request that Officers schedule a seminar for members of Audit & Procurement Committee to cover the Information Risk approach in more detail
3. Request that Officers report on the completion of mandatory training to the Committee on an annual basis
4. Make any additional recommendations that the Committee considers appropriate.

**List of Appendices included:**

*None*

**Other useful background papers:**

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

<http://democraticservices.coventry.gov.uk/documents/s30254/Information%20Management%20Strategy%20Update.pdf>

*Report to Audit and Procurement Committee on 24<sup>th</sup> October 2016*

<http://democraticservices.coventry.gov.uk/documents/s31433/Information%20Management%20Strategy%20Update.pdf>

Glossary of terms

<http://democraticservices.coventry.gov.uk/documents/b34223/Information%20Management%20Strategy%20Update%20-%20Glossary%20of%20Terms%2024th-Oct-2016%2015.00%20Audit%20and%20Procurement.pdf?T=9>

**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*

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

- 1.1 The Council's Information Management Strategy was approved by Cabinet in March 2016. A key workstream 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 of data protection arrangements and industry specialists In-Form Consult (IFC) conducted a maturity assessment across the Council of 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 had planned to conduct a follow up audit in March 2017 to review progress against those recommendations. It had been agreed that the follow up audit would take place 21 – 23 March 2017. However, the ICO has indicated that these dates are no longer possible due to staffing changes beyond the control of the ICO's Audit Team. It is anticipated that the re-visit will take place in 2017/18. The ICO will send us details of potential dates in due course.
- 1.4 The separate 'maturity' assessment conducted by IFC considered the whole of the Council, and the wider information management arrangements as well as the aims and objectives of the Information Management Strategy. 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 completion of the actions from the ICO gives the council a platform from which to begin preparations for some of those wider initiatives and preparation for the future, as recommended by IFC. This will include preparations for the move to the new General Data Protection Regulations (GDPR), and linking existing data sets to work towards a 'golden' record for addresses and customers.
- 1.6 The report to Audit and Procurement Committee on 24<sup>th</sup> October 2016 gave an update on progress against both of these action plans, and this report provides a further update of progress ahead of the ICO's planned follow up audit.

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

- 2.1 The report to Audit and Procurement Committee on 24<sup>th</sup> October 2016 detailed how out of 77 actions from the ICO recommendations, 46 had been completed; 27 were in progress, and 4 were yet to begin.
- 2.2 The 27 actions which were labelled as 'In Progress' have now all been completed. In completing these actions, some further opportunities have been identified to improve our

data sharing agreements and the Information Governance Team are continuing to work on reviewing existing agreements.

- 2.3 3 of the 4 actions which had not yet begun at the time of the last update have also now been completed and have been signed off by the Information Management Strategy Group. These actions related predominantly to the Council's Information Risk approach, and included the compilation of an Information Risk Policy and Register
- 2.4 The information risk approach has been aligned to the management of corporate risks, and in order to share the content in more detail, it is proposed that a seminar is scheduled for members of the Committee.
- 2.5 The final action which had not yet begun at the time of the last update related to the review of the Coventry Information Sharing Protocol. On further review, this action has been superseded by individual Data Sharing Agreements and should a new protocol be required it can be shorter and less specific, but complemented by specific data sharing agreements with partners.
- 2.6 We are also in the process of recruiting a permanent Records Manager. It is anticipated that interviews will take place in early March 2017.
- 2.7 Since the last update in October 2016, further work has been completed to ensure that information assets are logged in our information asset register, with Information Asset Owners (IAOs) identified. The IAOs are responsible for the assets relating to their function, and will be asked to report on a regular basis on any changes to the physical status or risk status of those assets. Training, support and guidance has been prepared for officers taking this role and this will become mandatory.
- 2.8 Responsibilities for all staff have been reinforced within the new online Information Governance Handbook and a revised Data Protection E-Learning course, which must be completed by all employees on an annual basis. Since the launch of the training on 3<sup>rd</sup> November, 1487 members of staff have completed the course, and a targeted communications plan is in place to ensure that all remaining members of staff also complete the course. In view of the mandatory annual training requirement, it is proposed that completion statistics are reported to the Committee on an annual basis.
- 2.9 The Audit Plan approved by the Committee on 24<sup>th</sup> October 2016, includes time for the Internal Audit team to assess the Information Governance arrangements within Revenues and Benefits and Children's Services to measure the impact of the changes ahead of the proposed follow-up audit by the ICO. Despite the change to the schedule of the ICO visit, it is proposed that the internal audit continue as planned and that any findings from that exercise be taken forward and implemented.
- 2.10 With all 77 recommendations from the ICO now complete, the Information Management Strategy Group anticipate that a significantly improved level of assurance would be received from the ICO at the point of their follow-up visit. Furthermore this now gives the Council a solid platform on which to build its approach to information management as covered by the Information Management strategy. The strategy sets out the aims to go beyond the requirements of the ICO and to use information as a strategic asset and gain maximum value from its use, whilst remaining confident in the compliance with data protection and information security legislation.

### **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 have now been implemented but further analysis will be undertaken in line with the original timetable to ensure that the work undertaken to date has had the required impact.
- 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 the Information Asset Register has given greater visibility of those risks; identifying the asset 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.

**Report author(s):**

**Name and job title:**

**Joe Sansom (Transformation Programme Manager)**

**Directorate: Resources**

**Tel and email contact: ext x1982 joe.sansom@coventry.gov.uk**

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Directorate or organisation</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Other members				
<b>Names of approvers for submission:</b> (officers and members)				
Lisa Commane	Assistant Director: Transformation, ICT and Customer Services	Resources	07/02/2017	07/02/2017
Finance: Jane Murphy	Head of Transformation and Major Projects	Resources	07/02/2017	09/02/2017
Legal: Helen Lynch	Legal Services Manager	Resources	07/02/2017	09/02/2017
Members: Councillor George Duggins				
Councillor Sucha Bains				

This report is published on the council's website:

[www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)