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13 April 2017

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership – Cllr George Duggins

**Director Approving Submission of the report:**

Director of Finance and Corporate Services

**Ward(s) affected:**

All

**Title: Information Management Strategy Update – Information Risk Policy**

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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 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; October 2016, and February 2017. The

most recent report highlighted that of the 77 recommendations proposed by the Information Commissioner's Office, 75 had been completed, with the remaining 2 requiring final approval. These final actions related to the creation of an Information Risk Policy and Information Risk Register. This report presents the draft Information Risk Policy for approval.

**Recommendations:**

The Cabinet Member for Policy & Leadership is recommended to:

1. Approve the Information Risk Policy
2. Make any additional recommendations that the Cabinet Member considers appropriate.

**List of Appendices included:**

*Information Risk Policy*

**Other useful background papers:**

*Report to Audit & Procurement Committee on 20 Feb 2017*

<http://democraticservices.coventry.gov.uk/documents/s32970/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*

**Report title: Information Strategy Update – Information Risk Policy**

## **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 in October 2015
- 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 A number of progress reports in relation to those actions have been considered by the Audit and Procurement Committee and Cabinet Member for Policy & Leadership. The last report to Audit and Procurement Committee on 20th February 2017 gave an update on the 77 recommendations, and showed that 75 had been completed with the final two, relating to the draft Information Risk Policy, which required final approval. This report seeks to gain that approval of the policy.
- 1.4 The draft Information Risk Policy is consistent with the Council's approach to corporate risk. The Policy also sets out the statutory responsibilities of the Senior Information Risk Owner (SIRO), the Information Management Strategy Group (IMSG) and Information Asset Owners (IAOs) in respect of information risk management. A copy of the draft Information Risk Policy is attached at Appendix 1 to this report.

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

- 2.1 Following the recommendations from the ICO, the collation and implementation of an Information Risk Policy and Register were key requirements to ensure that information risks are identified and managed to ensure that any information breaches are avoided.
- 2.2 The draft Policy builds on earlier work undertaken as a result of the ICO's recommendations and forms part of a wider Information Governance Framework, which also includes the Information Asset Register (IAR)
- 2.3 The IAR was compiled with service managers across the entire organisation, and lists all the information (in the form of paper records, electronic documents and data) that is held by that service which is deemed to be of value, and/or carries a certain degree of risk whereby an event could impact on its confidentiality; its integrity or its availability. Each 'asset' has an Information Asset Owner (IAO) identified, and it is the role of the IAO to ensure that the register is maintained, and that any assets which carry a level of risk are treated to mitigate or minimise any risk. Where significant risks are identified, these are recorded on the Information Risk Register. The Senior Information Risk Owner supported by the Information Management Strategy Group will maintain oversight of the Information Risk Policy, Risk Register and the Information Asset Register.
- 2.4 Training has been prepared in the form of an e-learning course which will be mandatory for all IAOs, and this training includes the management of information risk. IAOs will also receive support in the process of updating the register via the Information Governance Team and the Records Manager. Guidance and templates have been prepared for inclusion in the online Information Governance Handbook which is available via Beacon.

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

- 3.1 There is no requirement for the Council to consult on the implementation of the recommendations. However, the Audit and Procurement Committee monitors the effective development and operation of risk management. Therefore, on 20 March 2017, a seminar was held for members of the Audit and Procurement Committee to explain the Council's approach to corporate and information risk approach
- 3.2 This seminar was primarily focused on the principles of risk management and the assessment and treatment of risks. Specific examples relating to information risk were used as worked examples detailing the process that Information Asset owners would follow in identifying, assessing, treating and managing risks to which their information assets might be subject.

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

- 4.1 Once the Policy has been approved, it will be implemented immediately.
- 4.2 The IAOs will be invited to undertake the training by 30 June 2017
- 4.3 The process to collate information risks from the Information Asset Owners will be overseen by the Records Manager who has recently been recruited and is expected to be in post in April 2017.

#### **5. Comments from Director of Finance and Corporate Services**

- 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 draft Policy forms part of the wider Information Governance Framework, which helps to ensure that information is managed appropriately. 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. This policy will now enable those risks to be identified more formally.

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

Improved management of Information Risk will ensure that the likelihood of information breaches occurring will reduce. It will enable the council to learn from information risk incidents and adopt learning to ensure continuous improvement of the way that information is managed.

The Information Risk Policy is a key requirement of the Information Management Strategy, and will also help the council to manage opportunities as well as risk by informing the approach to open data, whereby information will be published and/or shared wherever possible and appropriate to improve the outcomes for local people.

### **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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## Appendices