



Information Governance Action Plan - Update

SUMMARY

- 1.1 This report provides members with an update on progress with implementation of the Action Plan drawn up following the audit by the Information Commissioner's Office of the Council's data protection processes.

RECOMMENDATION

- 2.1 To note the progress being taken on actions to improve the information governance framework.

REASONS FOR RECOMMENDATION

- 3.1 The Audit and Accounts Committee is responsible for providing assurance to the Council on the effectiveness of the governance arrangements, risk management framework and internal control environment.

SUPPORTING INFORMATION

- 4.1 At its meeting on 12 December 2012, Committee was presented with the executive summary report following the Information Commissioner's Office's (ICO) audit of the Council in September 2012.
- 4.2 An action plan had been drawn up by the Information Governance Board to address the recommendations made by the ICO. At the meeting, members requested regular updates on progress with the actions. The full action plan is attached at appendix 2.
- 4.3 The action plan is a living document which will be amended to take account of new legislation, changes in procedures/processes within the Council and other developments both internal and external that could affect our information governance framework. The plan covers the period to April 2014 and is monitored on a regular basis by the Information Governance Board, chaired by the Council's Senior Information Risk Owner.

- 4.4 A number of the actions are dependent on other actions being completed. We are also finding that recommendations made by ICO involving IT changes are no longer possible in the format that they have suggested.
- 4.5 The move back to the Council House has meant that some targets have not been met and revised targets have been set for these actions. The change in IT infrastructure under new ways of working has also impacted on how IT solutions to recommendations can be achieved.

OTHER OPTIONS CONSIDERED

5.1 N/A

This report has been approved by the following officers:

Legal officer	N/A
Financial officer	N/A
Human Resources officer	N/A
Estates/Property officer	N/A
Service Director(s)	N/A
Other(s)	Alison Moss, Information Governance Manager Chief Officer Group

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Background papers:	None
List of appendices:	Appendix 1 – Implications Appendix 2 – Information Governance Action Plan

IMPLICATIONS

Financial and Value for Money

1.1 None directly arising

Legal

2.1 None directly arising

Personnel

3.1 None directly arising

Equalities Impact

4.1 None directly arising

Health and Safety

5.1 None directly arising

Environmental Sustainability

6.1 None directly arising

Property and Asset Management

7.1 None directly arising

Risk Management

8.1 The effective management of risk is a core principle of good information governance.

Corporate objectives and priorities for change

9.1 The functions of the Committee have been established to support delivery of corporate objectives by enhancing scrutiny of various aspects of the Council's controls and governance arrangements.

Information Governance Action Plan

Key to RAG rating	Red	Significant slippage
	Amber	Some slippage
	Green	On target / Complete
	Blue	Not started

No	Action	Owner/Lead Officer	Responsible Officer	Target Date	Revised target date	Status	
						Comments	Rating
1	Develop and implement a Records Management strategy and policy (a.3/b.1)	HoGA/IGM	Richard Boneham & Alison Moss	end Feb 2013		In progress	Amber
2	Develop and publish an Information Governance Strategy - which should be signed by all staff (a.7)	SIRO	Richard Boneham & Alison Moss	Strategy by end Jan 2013 - sign off from March 2013	Strategy drafted by end Feb 2013 - Sign off by end April 2013.	Draft out for consultation	Green
3	Identify and appoint Information Asset Owners (IAO) and appropriately trained officers in each area to provide backup to IGM (a.10)	SIRO	Chief Officers	IAO's appointed by end Dec 2012 - nominated officers in each department by end April 2013		Completed	Green
4	Carry out training for SIRO/IAO's	SIRO/IAO's	SIRO/IAO's	Training scheduled for Tuesday 15 January 2012		SIRO – Completed IAO - Part Completed – next workshop April 13.	Amber
5	Establish a formal exercise to identify and record the Council's key information assets	SIRO/IAO's	IAO's	end June 2013		Not started	Blue
6	Identify operational information risks and add to departmental risk	SIRO	HoS	end Mar 2013		To be part of Business Planning process	Green

No	Action	Owner/Lead Officer	Responsible Officer	Target Date	Revised target date	Status	
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	registers (a.12)						
7	Add strategic information risks to departmental risk registers (a.14)	IAO's	IAO's	end Mar 2013		To be part of Business Planning process	
8	Develop and implement an Information Risk Policy (a.12)	HoGA	Chris Salt	end Feb 2013	End May 13	Lack of resources due to work required on main insurance tender.	
9	Review Information Governance framework	IGB	Alison Moss			Completed	
10	Develop and implement a Privacy Impact Assessment Policy include these in the Project initiation/business case process (a.15)	IGM/Dir of ICT	Alison Moss & Nick O'Reilly	end Jan 2013	end Feb 2013	Completed	
11	Make sure that risks to personal data is included as a consideration in the risk management strategy (a.16)	HoGA	Richard Boneham & Alison Moss	end July 2013		To be done as part of the refresh of the Corporate Risk handbook	
12	Investigate if risk assessments are undertaken prior to procuring services from 3 rd party contractors processing personal data (a.17)	SIRO	Ray Poxon	end Dec 2012		Completed	
13	Review with HR/Procurement how best to introduce and carry out risk assessments when entering into agreements with 3rd parties who will be handling or processing personal data (a17)	HoGA	Hannah Parry & Ray Poxon	end Mar 2013		In progress – template risk assessment is now part of the tender pack	
14	Conduct audit of data processing agreements within directorates (a18)	IAO's	IAO's	end June 2013		Not started	
15	Review data processing agreements for security arrangements (a18)	IGM	Alison Moss	end Aug 2013		Not started	
16	Add field within Contracts Register to record data processing activities	SIRO	Ray Poxon	end Dec 2012		Completed	

No	Action	Owner/Lead Officer	Responsible Officer	Target Date	Revised target date	Status	
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	(a18)						
17	Agree scope and document audit requirements for information governance with Internal Audit – include on audit plan (a.20)	HoGA/IGM	Richard Boneham & Alison Moss	end Jan 2013		Completed	
18	Make sure e-learning modules on Data Protection (DP) are mandatory for all staff and training to be completed by end March 2013 Information Security by end Oct 2013 (a.23) (c.17)	SIRO/IGM	Roger Kershaw, Alison Moss & Hannah Parry	Pilot Group identified to complete by December 2012 Rest of authority by end March 2013 for DP End October 2013 for Information Security		Part completed	
19	IGB to develop and own metrics to allow measurement of the effectiveness of DCC approach to DP and IS. (a.24)	Information Governance Board	IGB	Develop and agree metrics by end Jan 2013	End Apr 13	On-going	
20	Investigate if statistics in relation to information security can be pulled from the ICT service desk (a24)	Dir of ICT	Nick O'Reilly	end Jan 2013	end Feb 2013	Completed – not possible to get all of the metrics required.	
21	Establish the Records Management function and embed across the Council (b2)	SIRO/HoGA	Roger Kershaw & Richard Boneham	end June 2013		Not started - Flows from production of Records Management Policy and Strategy.	
22	Review and update employee DP leaflet(b.4)	IGM	Alison Moss	end Feb 2013	End Apr 13	Not started - Other priorities have taken precedent	
23	Provide records management training for designated staff (b.5)	HoGA	Richard Boneham	end June 2013		Not started	
24	Link records of mandatory training undertaken within new HR system	SIRO	Hannah Parry & Kirsty Alldred	end Sep 2013		Dependent on timetable for implementation of new HR system.	
25	Develop and implement an Information Asset Register (IAR)	IAO's	IAO's	end July 2013		Not started	

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	(b.15)						
26	Identify information flows within directorates (will form part of the IAR) (b16)	IAO's	IAO's	end July 2013		Not started	
27	Schedule annual checks of off-site storage facility to make sure of continued security assurance. Contract allows for this to happen. (b.19)	HoGA/IGM	Richard Boneham & Alison Moss	1st visit to be completed by end June 2013		Not started	
28	Publish updated records retention schedule and review local schedules for consistency (b22)	IGM	Alison Moss	Publish records retention schedule by end Nov 2012 Review local schedules from May 2013		The Council has a retention schedule which is available on iDerby. Local schedules still need to be reviewed.	
29	Targeted deletion facility to be introduced from November 2012. Policies to be written to control this - and published before deletion takes place (b25)	Dir of ICT	Nick O'Reilly	end December 2012	TBA	Council do not believe this is now an option. Need to discuss with ICO.	
30	Assign officers responsible for housekeeping paper records held in offsite storage in departments in line with the document retention schedules (b29)	IAO's	IAO's	by end June 2013		Not started	
31	Roll out corporate Protective Marking Scheme across the authority (b.30)	IAO's/IGM	IAO's & Alison Moss	by end Sep 2013		In progress	
32	Explore options and provide estimates to expand the Council's IT asset register to capture all devices and peripherals capable of storing data. Consider Developing a CMDB (c.11)	Dir of ICT	Nick O'Reilly	by end June 2013		Not started	

No	Action	Owner/Lead Officer	Responsible Officer	Target Date	Revised target date	Status	
						Comments	Rating
33	Improve staff awareness of logging information security incidents. Consider including 'near misses' (c.16)	IGM	Gordon Stirling for SUI & Alison Moss	On-going		In progress	Green
34	Consider implementing a log of when records are archived and or disposed across the authority (b.43)	IGM	Alison Moss	by end May 2013		Not started	Blue
35	Develop an induction programme for all new starters on Information Security (IS) (c.18)	IGM	Tariq Iqbal	by end Mar 2013		Part completed	Orange
36	Amend the contract register to ensure that management are aware of contractors who are handling or processing the Council's data and to allow management to maintain oversight through regular reviews of technical and organisational safeguards (c.19)	SIRO	Ray Poxon	be end Dec2012		Completed	Green
37	Introduce a visitor policy for the whole Council (c.24)	SIRO	Bernard Fenton	end December 2012		No update received on progress.	Red
38	Consider introducing visitor badges for all council buildings (c.24)	SIRO	Bernard Fenton	TBA		Completed for Council House, but not for all Council buildings	Orange
39	Introduce key cabinets or similar to securely store locker and pedestal keys (c.25)	SIRO	Roger Kershaw	CH will have key cabinets in place for recant Review of the rest of the Council by end June 2012	end Feb 2013	Cabinets installed but not fit for purpose.	Red
40	Conduct a review of confidential waste processes across the whole authority and introduce a uniformity of approach (c.26)	SIRO/IGM	Sandra Cole	by end August 2013		In progress	Green

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41	Consider introducing a process to track documents printed off from information systems that contain personal data and are taken off site. This is to make sure that they are returned and/or securely destroyed. Also consider introducing an authorisation process for taking records off site (c.28)	IGM	Alison Moss	End May 2013		Not started	
42	Leavers process issues to be resolved asap (c.31)	IGB	IGB	by end Feb 2013		Not completed	
43	Implement an agreed process or timetable to review a sample of user access permissions - by issueing quarterly reports to managers (c.37)	Dir of ICT	Glyn Peach/System administrators	Core network by 1 Jan 2013 Major ICT systems by 1 April 2014		In progress	
44	Make sure that endpoint controls are in place to enforce policy around the user of USB devices - for example by preventing the use of non council USB data sticks or the use of external hard drives	Dir of ICT	Glyn Peach	Between 1st December 2012 and 28 February 2013	By end March 2014	Completed for those staff in Council House. Will be rolled out as part of the Desk top replacement project.	
45	Introduce appropriate technical safeguards to make sure that data does not leave the council's systems without authorisation (c.49)	Dir of ICT	Glyn Peach	by 1st Mar 2013	By end March 2013	All appropriate technical safeguards are implemented – but it doesn't stop data leaving the authority.	
46	Raise awareness of information security to make sure employees know that they must not save or transfer Council information to non-Council owned pc's. (Issue currently in Housing Ops) (c.50)	IGM	Alison Moss	By end Dec 2012		Ongoing/ Completed	

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47	Consider implementing a process to centrally purchase USB sticks. Check if asset management tools can log USB sticks and if not explore options and costs for a solution that does (c.46)	Dir of ICT	Glyn Peach	by 1st Mar 2013	By end March 2013	All purchased via Serco.	
48	Make sure patch controls are in place so that exploitable weaknesses are minimised in areas falling outside of normal patch control processes (e.g. flash/Java) (c.55)	Dir of ICT	Glyn Peach/Miles Peters	end Jan 2013	By end of Aug 13	part completed	
49	Finalise framework documents/policies (a3)	IGM	Alison Moss	Feb-13		Ongoing	
50	Develop a method to ensure that staff have read and understood new or revised policies. For example: by asking staff to provide some form of confirmation to the IG Manager. This will give the Council a level of assurance that staff are aware of their responsibilities (a6)	Director HR	Nikki Gibbons	From March 2013		Linked to implementation of Policy E-learning module	