AUDIT COMMITTEE
26 SEPTEMBER 2014

ITEM NO. ....

INFORMATION GOVERNANCE PROGRAMME PROGRESS REPORT

SUMMARY REPORT

Purpose of the Report

1. The Chief Officer's Board (COB) is required to report six monthly to the Audit Committee on progress and planned developments of the information governance programme.

Summary

2. Information governance is an 'above the line' risk on the corporate risk register. This report sets out progress in the delivery of the information governance programme, focussing on the following key areas

    (a) Information security policy
    (b) Information risk assessment and improvement action plan
    (c) Information governance training and awareness
    (d) Information classification and handling
    (e) Information sharing
    (f) Information security incidents
    (g) Data quality
    (h) Transparency agenda

3. The Council is making gradual progress on the delivery of the information governance programme. Implementation of the action plans is ongoing across the services, supported by the Information Governance Team. Progress is being monitored by Assistant Directors for evidence of effective delivery.

4. Recently there has been a shift in focus from evidencing compliance with the Council's information governance programme to compliance with the Department of Health IG Toolkit, a key enabler of the effective information sharing and collaborative working requirements of the Better Care Fund and the Care Act 2014.

Recommendation

5. It is recommended that progress on the implementation of the Information Governance Programme be noted.

Reasons

6.   The recommendation is supported to provide the Audit Committee with evidence to reflect on progress in delivery of the Council's Information Governance Programme.

Paul Wildsmith
Director of Resources and Neighbourhood Services

Brian James, Head of Corporate Assurance : Extension 2140
Peter McCann, Information Security Manager : Extension 156494

Background Papers

S17 Crime and Disorder	There is no specific crime and disorder impact.
Health and Well Being	There is no specific health and well being impact.
Carbon Impact	There is no specific carbon impact.
Diversity	There is no specific diversity impact.
Wards Affected	All wards are affected equally.
Groups Affected	All groups are affected equally.
Budget and Policy Framework	This report does not recommend a change to the Council's budget or policy framework.
Key Decision	This is not a key decision.
Urgent Decision	For the purposes of the 'call-in' procedure this does not represent an urgent matter.
One Darlington: Perfectly Placed	There is no specific relevance to the strategy beyond a reflection on the Council's governance arrangements.
Efficiency	Implementation of effective information governance systems and procedures has a positive impact on efficiency.

MAIN REPORT

Background

7.   Information governance remains an 'above the line risk' on the corporate risk register. This is a generic risk reflecting a number of specific information management areas that are currently assessed as high risk to the Council and as such require appropriate treatment.

Current Position

Information security policy

8. The Council's corporate policy statement endorsed by the Chief Executive and approved by Cabinet in December 2009 sets out the policy and objectives of information security management. The policy statement is reviewed annually by the Information Security Manager and remains relevant and fit for purpose in its original form.

Information risk assessments

9. The majority of services have developed their risk-based action plans and are in the process of implementing them. The development of plans in services that have recently been restructured has been delayed, but work is now being undertaken to complete this task.

10. The Information Governance Team is supporting Heads of Service with the implementation of their actions by providing advice and guidance as necessary. Assistant Directors are monitoring the implementation of the plans for evidence of successful delivery.

11. Delivery of the action plans will be a significant step towards compliance with the Department of Health Information Governance Toolkit (IG Toolkit), a pre-requisite for sharing information with Health partners via their secure (N3) network. Focus on the importance of compliance with the IG Toolkit has been raised recently by the requirements of the Better Care Fund and the Care Act 2014 and work is underway to complete the document by the end date of 31st March 2015.

12. The Council's network is certified by the Cabinet Office as compliant with the Public Service Network (PSN) standard and therefore satisfies all of the technical requirements of the IG Toolkit. However there are a range of non-technical governance requirements that must be evidenced for corporate compliance.

13. In addition to the requirement for corporate compliance to the IG Toolkit, Public Health are allowed access to the N3 network based on a 'slimmed-down' version of the Toolkit due to the nature of their activity and their previous experiences with Health Service governance arrangements. Our Public Health team have almost completed evidencing the requirements of their version of the IG Toolkit to advance connection to the N3 network by late 2014.

Information governance training and awareness

14. The Employees Guide to Information Security has been rolled out via the Council's intranet as a mandatory course for all staff who have access to the corporate network. For those staff with no access, a leaflet developed covering information management issues and responsibilities was provided to line managers for distribution as appropriate.

15. The Information Governance Team offer additional training on all aspects of information governance and deliver tailored sessions in response to requests.

Information classification and handling

16. The Council have adopted the Government Security Classifications scheme. The scheme was due to be piloted in the Council commencing March 2014 but has been delayed. The pilot is now scheduled for late 2014 and will cover the classification of emails and electronic documents.

Information sharing

17. The Complaints and Information Governance (CIG) Team is continuing to work with key public sector partners to review and implement service-level information sharing agreements where required. In particular, the CIG Team is working closely with County Durham and Darlington NHS Foundation Trust (CDDFT) to create a central shared register of information sharing agreements so that these can be more easily monitored and reviewed and any gaps addressed.

18. Services have also made significant progress in implementing information sharing agreements with the support of the CIG Team. The most recent example being the Darlington Multi-Disciplinary Team for Frail Elderly and Long Term Conditions Information Sharing Agreement.

Information security incidents

19. The information security incident reporting and management process is now embedded. The identification, reporting and the initial response phases of the process are working effectively. The timely documentation of remedial action plans and their successful implementation and sign-off by senior management, which is effectively the risk treatment part of the process, requires improvement.

Data quality

20. Work is progressing on improving data quality across the Councils major business systems, with a specific focus on data within the CareFirst system used by Adults and Children's Services. This work on improving data quality is being aligned with the requirements for data quality as determined by Ofsted and also in preparation for the replacement of the current case management system.

21. Work continues on the quality of data used within the performance management framework both at source, in the business system, but also as part of the analysis of the data to inform the Council's regime of performance clinics.

Transparency

22. The CIG Team are due to present their fourth annual Freedom of Information, Environmental Information and Subject Access Request Report to Cabinet in November 2014.

23. The report will make further recommendations regarding the publication of frequently requested information with the aim of reducing the cost of responding to individual requests for information and improving transparency.

24. The report will detail the amendments made to the Council's FOI and EIR Request Procedure following the introduction of the Protection of Freedoms Act 2012.

25. The Operational Planning Unit is also to present a report to COB in the coming months detailing the requirements of the Local Government Transparency Code 2014 and what the Council needs to do in order to comply.

Conclusion

26. There has been gradual progress with the implementation of the information governance programme and there is still a significant amount of work to be done to reach a position where our information governance risk is effectively managed.

27. The requirements of the Better Care Fund and the Care Act 2014 have moved the focus of the information governance programme to compliance with the IG Toolkit. In reality this has no significant impact on the ongoing work as the requirements simply reflect best practice; it does however set an April 2015 deadline for the completion of specific tasks. Failure to hit these deadlines may adversely affect the Council's ability to deliver effective services.

Outcome of consultation

28. No formal consultation was undertaken in production of this report.