AUDIT COMMITTEE
28 October 2020

INFORMATION GOVERNANCE PROGRAMME PROGRESS REPORT

SUMMARY REPORT

Purpose of the Report

1. The Systems and Information Governance Group (SIGG) is required to report six monthly to the Audit Committee on progress and planned developments of the information governance programme.

Summary

2. The ongoing delivery of our information governance programme continues to provide the assurance required to reduce our information risks to an acceptable level.

3. Ongoing work includes:

    (a) Preparing for data protection after the EU Exit transition period ends.

    (b) Review of the Council's Information Asset Register (IAR) and Privacy Notices.

    (c) Provision of advice to ensure the Council's CCTV is compliant with the General Data Protection Regulations/Data Protection Act 2018 and the Protection of Freedoms Act 2012.

    (d) Work to achieve our target for the completion of on-line mandatory information governance training courses.

4.   The area of highest priority in the information governance programme is:

    (a)   Preparing for data protection after the EU Exit transition period ends.

Recommendation

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

Reasons

6. To provide the Audit Committee with a status report on the delivery of the Council's Information Governance Programme.

Paul Wildsmith
Managing Director

Lee Downey, Complaints & Information Governance Manager: Extension 5451

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. Delivery of our information governance programme has provided the assurance required to reduce our information risks to an acceptable level. While that is the case it must be recognised that the data processing activities of the Council continually evolve and must be kept under review. The processes implemented by the Council include review mechanisms to ensure this takes place.

Current Position

Preparing for data protection after the EU Exit transition period ends

8. On 15 October 2020 SIGG approved an action plan developed in response to the Government's guidance: Preparing for data protection after the EU Exit transition period ends: Guidance for Local Authorities. The action plan aims to mitigate, as far as is possible, the impact of the UK not being granted adequacy decisions by EU under the General Data Protection Regulation (GDPR) before 31 December 2020, in order to ensure data flows from the EU/EEA to the UK can legally continue.

Review of the Council's Information Asset Register (IAR) and Privacy Notices

9. Having compiled a record of the Council's processing activities i.e. an IAR in accordance with Article 30 of the General Data Protection Regulations (GDPR) the Council has now commenced a review of the IAR and associated privacy notices.

10. It is the Council's intention to broaden the scope of the IAR to ensure that all of the data the Council holds, not just personal data, is recorded so that it can be properly governed. This review will be essential in realising the efficiencies the Council can achieve by rolling out the functionality available to the Council as part of the Microsoft Office 365 suite. It will also support the Council in preparing for the end of the EU Exit transition period.

11. It was agreed by SIGG on 17 October 2019 that the update of the IAR will be used to pilot some of this functionality within the Microsoft Office 365 suite. Those officers involved in updating the IAR have been given access to all of the functionality within Microsoft Teams.

12. A Microsoft Team has now been created comprising of the Data Protection Officer (DPO), Information Asset Owners (IOAs) and those officers nominated by IAOs to update the IAR on their behalf. All updates to the IAR are taking place within the Team and the functionality in terms of being able to collaborate on the document remotely is proving very successful.

CCTV

13. As set out in the last update to Audit Committee the DPO updated the advice issued on 20 November 2018 to include the Surveillance Camera Commissioner's advice and convened a meeting to progress the work required to ensure the Council's CCTV systems comply with the relevant legislation.

14. The DPO continues to work directly with those services that use CCTV to ensure compliance.

Training and awareness

15. Internal Audit identified an issue with the figures reported in terms of completion rates i.e. that the figures provided are obtained from Academy 10 and do not include those employees who do not have access to a computer to complete the training.

16. While non-IT users are less likely to process personal data, Internal Audit recommended the figures should include completion rates for non-IT users. HR has contacted the managers responsible for those staff who do not have access to a computer and asked for both the Data Protection 2018 and Social Media modules to be prioritised.

17. The revised table in Appendix 2 shows the position at 15 October 2020 with regard to the completion of the mandatory on-line information governance courses for IT and where applicable, non-IT users. Completion rates of over 95% for the courses remains the Council's target and represents an acceptable level of take up which must be maintained.

18. The current position shows the target has been met by Resources in relation to Information Security and Data Protection 2018. Overall, the Council has not met its target in relation to any of the three modules. It is worth noting the new Social Media policy was only launched in April 2020.

19. In order to drive up completing rates, in October the Council is moving to the Traffic Light Facility in Academy 10. This dashboard will enable managers to monitor real time progress against all essential modules. The facility will also send prompts in relation to outstanding modules. With regards to completion rates for non-IT users, this will be chased and reported to ADs, where appropriate, on a quarterly basis.

Conclusion

20. The Council's information governance programme clearly sets out key objectives, roles and responsibilities and priorities. Having implemented the majority of its GDPR compliance programme, which was based on the advice of the ICO, it is reasonable to conclude the Council has significantly reduced the risks associated with information governance.

Outcome of Consultation

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

Appendix 2

15/10/2020	Info Sec 2015		Social Media - New Module launched April 2020		DPA 2018		Computer Users - As at 01.09.20
	Comp	%age	Comp	%age	Comp	%age	
Children & Adult's Services	**539**	**92.29**	**348**	**59.59**	**543**	**92.98**	**584**
Adult Services	133	93.66	56	39.44	133	93.66	142
Children's Services	210	89.36	131	55.74	216	91.91	235
Commissioning, Performance & Transformation	106	94.64	86	76.79	105	93.75	112
Educational Services	83	94.32	73	82.95	82	93.18	88
Public Health	7	100.00	2	28.57	7	100.00	7
Economic Growth & Neighbourhood Services	**498**	**94.86**	**218**	**41.52**	**489**	**93.14**	**525**
Community Services	168	89.84	55	29.41	167	89.30	187
Economic Growth	51	96.23	23	43.40	49	92.45	53
Housing and Building Services	214	99.07	115	53.24	212	98.15	216
Transport & Capital Projects	65	94.20	25	36.23	61	88.41	69
Resources	**163**	**97.02**	**122**	**72.62**	**164**	**97.62**	**168**
Darlington Partnership & Creative Darlington	3	100.00	1	33.33	3	100.00	3
Finance, HRM, Systems & Strat, Perf & Comms	85	96.59	63	71.59	86	97.73	88
Law & Governance	75	97.40	58	75.32	75	97.40	77
Total	**1200**	**93.97**	**688**	**53.88**	**1196**	**93.66**	**1277**
	Comp	%age	Comp	%age	Comp	%age	None Computer Users
None Academy 10 Users	N/A	N/A	To follow	To follow	197	30.40	648
Overall	**N/A**	**N/A**	**To follow**	**To follow**	**1393**	**72.36**	**1925**