



<b>Subject:</b>	Information Governance – Draft policies and procedures for approval
<b>Date:</b>	22 <sup>nd</sup> January 2016
<b>Reporting Officer:</b>	John Walsh, Town Solicitor
<b>Contact Officer:</b>	Robert Corbett, Records Manager Sarah Williams, Programme Manager

<b>Is this report restricted?</b>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
<b>Is the decision eligible for Call-in?</b>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	<p>The purpose of this report is to:</p> <ul style="list-style-type: none"> <li>- Set out the draft data protection policy (<b>Appendix 1</b>) and procedures (<b>Appendix 2a-e</b>) for approval by Committee.</li> <li>- Outline the development, in the medium-term, of a corporate Information Governance Framework (<b>Appendix 3</b>).</li> </ul>
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>• approve both the attached policy and procedures and</li> <li>• agree the development of a corporate Information Governance Framework.</li> </ul>
<b>3.0</b>	<b>Main report</b>
3.1	<p><u>Key Issues</u></p> <p>While the Council has had policies and procedures for the areas of data protection, freedom of information and records management since 2003, it is clear that these require to be updated in light of guidance from the Information Commissioners Office and recommendations by AGRS. Therefore, new policy and procedures have been developed to meet legal requirements and revised standards.</p>

3.2	<p>Members will be aware that non-compliance with legislation related to information governance is on the Corporate Risk Register due to the high financial and reputational risks. A breach of the Data Protection Act can result in a monetary penalty notice from the Information Commissioner of up to £500,000.</p>
3.3	<p>Since 2012, the Information Governance Unit has:</p> <ul style="list-style-type: none"> <li>• provided data protection awareness training to over 2,300 members of staff and more than 100 Decision-Makers and Record Liaison Officers;</li> <li>• created a video and booklet for non-office based staff;</li> <li>• developed the attached draft data protection policies; and</li> <li>• worked with Digital Services on scoping the development of the Council's Customer Relationship Management (CRM) software to record, monitor and report information queries;</li> </ul> <p>The Unit is now in the process of developing an e-learning refresher course with Human Resources to be ready in the next financial year.</p>
3.4	<p>The draft policy and procedures for approval are set out in <b>Appendices 1-3</b> of this report. The implementation of the policy will be through the ongoing staff programme and ad hoc assistance from the Information Governance Unit. The Information Governance Unit will liaise with Digital Services on taking forward the development and roll-out of the Council's CRM system to manage the Council's information queries.</p>
3.5	<p>Further actions from audits on the development of related policies, for example, Freedom of Information, Information Security and Retention and Disposal are currently underway.</p>
3.6	<p>While the staff training programme and attached draft policy and procedures help the Council mitigate the risks around information governance, it is suggested, in the medium term, that a refresh of the Council's 2008 Information Management Framework be carried out in the form of a corporate Information Governance Framework. This would provide an overall architecture for how the council captures, creates, accesses, secures, manages and shares its information both internally and externally. This would help to better manage the information the council holds, facilitate compliance with both legislation and general principles of good information governance. In this context it is important to note that following Local Government Reform, and in particular its role in relation to community planning, will result in the Council holding and sharing an even greater amount of sensitive information.</p>

3.7	<p>An information management framework would be structured around five main areas of Information Governance:</p> <ol style="list-style-type: none"> <li>1. Information governance management</li> <li>2. Records management</li> <li>3. Information compliance</li> <li>4. Information security</li> <li>5. Data quality and assurance</li> </ol> <p>With policies and procedures developed to ensure its implementation throughout the organisation. A draft outline of the framework is set out in <b>Appendix 3</b>.</p>
3.8	<p>A scoping exercise could be carried out as a first step to benchmark similar frameworks and identify the resource implications of developing and implementing an Information Governance Framework. It is proposed that a working group be established to take this forward.</p>
3.9	<p><u>Financial &amp; Resource Implications</u></p> <p>Each department already has staff in place to deal with information requests. Further training for staff who are responsible for deciding what information is released is available from the Information Governance Unit (Decision-Makers training course). Training will also be offered following the development of the CRM system.</p>
3.10	<p>The resource implications of the development and implementation of a corporate Information Governance Framework will emerge following an initial scoping exercise</p>
3.11	<p><u>Equality or Good Relations Implications</u></p> <p>None</p>
4.0	<p><b>Appendices – Documents Attached</b></p>
	<p><b>Appendix 1</b> - Draft Data Protection Policy</p> <p><b>Appendix 2 (a)-(e)</b> – Draft Data Protection Procedures</p> <p><b>Appendix 3</b> – Draft outline Information Governance Framework</p>