

## **AUDIT COMMITTEE**

**11 JULY 2013**

### **INFORMATION GOVERNANCE POLICIES**

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#### **Summary**

This report presents an update to the Audit Committee on the work to provide an improved set of policy and guidance for managers to enable appropriate handling of data protection and freedom of information requests, as well as the handling of information generally.

#### **1. Budget and Policy Framework**

1.1 It is within the ambit of the Audit Committee to consider the area of information governance.

#### **2. Background**

2.1 The council as a “public authority” and as a holder of personal and general information is subject to a number of well known pieces of legislation. For example individuals are entitled to ask to see the information we hold about them under the Data Protection Act. Individuals can seek to access general information about council processes and decisions under the Freedom of Information Act. Under the less well known Environmental Information Regulations there are access rights to a specific set of non-personal information.

2.2 There are also requirements to ensure that appropriate security measures are put in place to protect the different levels of information the council holds. This allows the Council to share information with partner organisations and the Government. There are best practice approaches to managing information generally to ensure that once we no longer need it, the information is safely destroyed. This includes both paper records and information and electronic information. This area of council activity is often referred to as “information governance.”

2.3 With the advent of public health responsibilities coming to the council including the relevant information sets which allow public health officers to carry out their role, the opportunity was taken to refresh existing policies and guidance and to add a set of additional advice and information aimed at Service Managers and all officers. Training was also recently provided on this subject to Members.

### **3. Advice and analysis**

3.1 The Information Commissioner's Office has oversight of data protection and freedom of information and has powers to prosecute public authorities and to impose substantial fines. Recently Glasgow City Council was fined £150,000.00 for the loss of two unencrypted laptops.

3.2 The Council has a number of measures in place to ensure that it complies with the data protection principle of taking measures to protect the security of data. We encrypt all laptops. We have a swipe card entry system for entering and exiting Gun Wharf. We ask visitors to our buildings to sign in. We have an IT Security Policy. We have IT security measures to provide a firewall to our servers. We limit access to certain of our software systems based on seniority of Officer and level of confidentiality of the information. We have building and team specific measures to protect the removal of paper records. We provide locking cupboards. We have a clear desk policy.

3.3 To enhance the current measures in place and to ensure that the Council learns from emerging best practice a Security and Information Governance Group has been established. This is chaired by the Senior Information Risk Officer (the Assistant Director of Legal & Corporate Services) and has representatives from the Directorates, Information Technology, Legal Services and Customer Relations. The Council has a Caldecott Guardian who has specific responsibility for information governance in Children's and Adults (this is the Deputy Director). The Council is also represented on the Kent and Medway Information Governance Forum that is predominantly a health led group but which provides up to date learning on information governance issues.

3.4 The Security and Information and Governance Group have developed a suite of policies and guidance that have been uploaded to the Intranet for officers to access. It is proposed that these are the subject of consultation with Officers for a period of two months. The guidance follows a self-help model with Officers seeking advice and support from Legal Services only where necessary. Following that it is proposed to provide a training session with Service Managers in September to allow feedback on the policies and guidance and to make any amendments as necessary. Copies of these draft documents, which are now out for consultation, will be available for Members at the Committee.

3.5 At the next meeting of the Audit Committee it is proposed to seek formal approval of the policies and guidance and to provide such information as Members deem relevant to ensuring that appropriate information governance measures are being followed.

3.6 Appendix 1 sets out a diagram of how the proposed information governance framework will work in practice.

#### 4. Risk management

4.1 There are reputational, legal and financial risks to the Council for not pro-actively seeking to ensure appropriate information security and governance.

<b>Risk</b>	<b>Description</b>	<b>Action to avoid or mitigate risk</b>
Reputational, legal and financial	A data breach occurs leading to the council being prosecuted by the Information Commissioner and fined	Refresh and augment the policy and guidance information available to Service Managers. Provide training to Managers and officers.
Financial	The Council stores both electronic data and papers records longer than necessary incurring associated storage and energy costs	The Security and Information Governance Group promotes good house-keeping of information and records.

#### 5. Consultation

5.1 The Security and Information Governance Group has been consulted on the preparation of the policies and guidance. Senior managers including the Caldecott Guardian have also been consulted.

#### 6. Financial and legal implications

6.1 The financial and legal implications are set out in the body of the report.

#### 7. Recommendation

7.1 The Audit Committee is asked to note the work to produce a suite of policy and guidance.

#### Lead officer contact

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#### Background papers

None



