Audit and Governance Committee
12 December 2014

6. INFORMATION COMMISSIONERS OFFICE AUDIT AND PROGRESS TO DATE

Recommendation

1. **The Head of Community and Environment recommends that the progress made against the recommendations put forward by the ICO following their visit be noted.**

Background Information

2. In February 2014 the Information Commissioners Office (ICO) undertook a consensual audit of Worcestershire County Council, looking specifically at three areas which included:

- Data protection governance – The extent to which data protection responsibility, policies and procedures, performance measurement controls and reporting mechanisms to monitor DPA compliance are in place and in operation throughout the organisation

- Security of personal data – The technical and organisational measures in place to ensure that there is adequate security over personal data held in manual or electronic form

- Data sharing – The design and operation of controls to ensure that sharing of personal data complies with the principles of the Data Protection Act 1998 (DPA) and the good practice recommendations set out in the Information Commissioner's Data Sharing Code of Practice.

3. The purpose of the audit was to provide the ICO and WCC with an independent assurance of the extent to which WCC, within the scope of the agreed audit, complied with the DPA?

4. The result of the audit was that the ICO had a 'very limited assurance' that processes and procedures in place were delivering data protection (DP) compliance.

5 Following the audit, the ICO presented the Council with a report and a list of recommendations. These recommendations have provided the focus of the work the organisation now undertakes to bring us up to an acceptable standard. These included:

Ensuring a robust governance structure

6. We have developed an Information Governance Structure which includes:

- John Hobbs Director of Business Environment and Communities (BEC) has taken on the role of SIRO (Senior Information Risk Owner) and is the lead in driving improvements and compliance across the organisation.

- A Corporate Information Governance Board has been set up – A group of senior managers/Information asset owners who are responsible for the strategic drive through the organisation

- A Corporate Information Governance Group has been set up – A group of operational managers who work in key areas of the organisation and directorate representatives who develop policy amendments and procedures, as well as option papers for the Boards determination/ratification.

Review of Policies

7. It was recognised that a number of policies were out of date and were overdue for review. A number of these have been updated and ratified by the new Information Governance board and include: Data Security Policy, Clear Desk Policy, Data Protection Policy, Privacy Notice, Privacy statement, Freedom of Information Policy, etc.

New policy development

8. Work has begun on developing a **Privacy Impact Assessment** template and policy. This is essential as we continue our work on becoming a Strategic commissioning authority. The new policy will outline how we can ensure that any personal information held by those organisations we have commissioned services to, is managed appropriately.

9. Work has begun on the development of an **Information Sharing Protocol**, to ensure that we are sharing information, lawfully, appropriately and securely between organisations. Whilst we have a number in place already we need to ensure consistency of approach across the organisation

10. The third major strand of work is around **Information Security.** This includes how we deal with Information breaches, carry out training and change the culture of the organisation as to how we manage information on a daily basis Building on the security checks first introduced by the old ACS directorate we are introducing a clear desk policy across the organisation where-bye all staff need to manage their information whether held electronically or in hard copy form .

Cultural Change

11. The work identified above is about cultural change and will take some time. The introduction of security checks , the provision of new red confidential waste bins, the 'Keep Data Safe' button on SID and the mandatory e learning training for Data Protection and Freedom of Information for all staff are all part of a package of measures which will gradually change our approach to information management ensuring that we are safe and compliant

Conclusion

12. There remains a considerable amount of work to do, both in terms of delivering against the ICO recommendations as well as changing our culture in order to raise the awareness and importance of how we look after, manage and deal with information.

13. However we have a team that are committed to driving this forward and a Governance Structure that ensure that the whole organisation top down is pulling in the same direction on Information Management.

14. The ICO is planning to return during 2015 to undertake a follow up audit where it is our objective to be able to demonstrate the significant progress we have made.

Contact Points

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Background papers

In the opinion of the proper officer (in this case the Head of Community and Environment) there are no background papers relating to the subject matter of this report.