Name of meeting: Corporate Governance & Audit Committee
Date: 16th November 2018

Title of report: Q1 & Q2 Information Governance Progress Report

Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	No
Is it in the Council's Forward Plan?	No
Is it eligible for "call in" by Scrutiny?	No
Date signed off by Director & name Julie Muscroft, Service Director for Legal, Governance and Commissioning	Yes
Cabinet member approval	Cllr Graham Turner

Electoral wards affected: N/A
Ward councillors consulted: N/A

Public or private: Public

1. Purpose of report

When the 2017/18 Information Governance Annual Report was presented to Corporate Governance and Audit Committee, more regular 6-monthly progress reports were requested. The intention of these regular reports was to provide Councillors with a more detailed overview of the main Information Governance events and activities for the year so far including an overview of the activities taking place to embed improved data protection practices, rather than a focus on the compliance rates which are a focus.

This report is for information and comment.

2. Key points

Information Governance is seen in the context of wider corporate governance. The way in which the council services utilise, manage, retain, share and dispose of information are the core components of robust information governance. It assists the council to reach a point where information and data

becomes an asset and an enabler to the council and its communities. It is the foundation of delivering our wider intelligence vision.

This report seeks to set out the breadth of activity and challenges in the context of information governance as a whole. By way of an overview, headline actions include details of the work intended to improve the information governance culture within the organisation and minimise risk from non-compliance with the General Data Protection Regulation, including:

- Reviewing policies, guidance and frameworks
- Promoting and updating awareness through learning and development
- Implementing initiatives to improve information security
- Delivering projects to update procedures for records management
- Identifying areas where Services require additional support and planning to deliver that support in the most appropriate way

3. Implications for the Council
In the context of wider corporate governance it is important that the Council continues its strategic approach to information governance that ensures legislative compliance whilst realising the opportunities and benefits of robust practice.

4. Consultees and their opinions
Members of the Information Governance Board were consulted on the contents of the attached report and endorse the information and proposals contained therein.

5. Next steps

This report updates Corporate Governance and Audit Committee with the progress currently being made with regards to the Information Governance developments within council services. These activities will continue and be monitored by the council's Information Governance Board. If this report is considered useful, a further end of year progress report will be brought to the April meeting.

6. Officer recommendations and reasons

That Corporate Governance and Audit Committee note and comment on the progress being made with Information Governance developments.

The Information Governance Board would be grateful for any comments from Members on the content of this report and ideas of what items Members would find useful to have included in future Information Governance Progress Reports.

7. Contact officer and relevant papers

Katy Deacon – Information Governance Manager and Data Protection Officer

Lindsay Foody – Information Access Officer
Carl Whistlecraft – Head of Democracy
Julie Muscroft – Service Director for Legal, Governance and Commissioning

GDPR Assurance - CGA Progress Report

Author: Katy Deacon
Date: November 2018

Summary
• General Data Protection Regulation (GDPR) came into force in May 2018. Kirklees Council had been working to bring working practices up to GDPR standards for the previous 12 months.
• In May 2018, Executive Team mandated the Information Governance (IG) Board to ensure that that the council's GDPR Implementation Plan was appropriately actioned to ensure GDPR compliance standards are achieved by May 2019.
• To begin this process all Services were asked to complete a GDPR Assurance self-assessment in September and all services provided their responses within deadline.
• IG Board have reviewed the September self-assessment results and have approved recommendations to provide further support activities to council services.
• The results of the September self-assessment show that all Services are working to GDPR requirements. Some services have requested further support to help embed these into every-day practices. This support will be provided via online videos, workshops, guidance notes and drop-in sessions.
• The Council has an established online incident reporting tool for staff members to report any information security incidents, which will help the Council to meet the 72hour GDPR reporting deadline.
• The Council has established a GDPR Assurance process to monitor the internal assurance at a team and service level.
• The Council is developing GDPR Assurance expectations for contractors and other partners
• The IG Board is developing an Information Governance & Management Strategy which will support the ongoing use and storage of information by the Council.
• All Council employees are completing GDPR training, either via the electronic online portal or through a paper version of the training. The deadline for completing this training is December 31st 2018. Colleagues who have not completed the online training will have their network access revoked.

Below is a detailed overview of the findings and resulting actions from the September GDPR Self-Assessment.

Self-Assessment Results		
Deliverable	**Headlines**	**Ongoing Actions**
Governance	Procedures involving the use of personal data have been identified and mostly revised as required	Formal guidance and workshops will be delivered in the coming months to provide additional support on data flow mapping, privacy by design and Information Asset Owner responsibilities.
Assurance	Internal GDPR assurance expectations are clearer following the self-assessment	GDPR Assurance workshops will be delivered from December to help Services embed the

	process. Services are working to embed Information Protection processes within their daily procedures	GDPR processes into day-to-day procedures
Third Party Management	Guidance is required to provide clarity around the Councils GDPR assurance expectations of Council contractors. Services have requested data sharing guidance to strengthen understanding of the legal basis for sharing data	The IG Team will deliver Information Sharing workshops and Council-wide drop in sessions for services. Following consultation with regional Council colleagues, guidance will be provided to all services to ensure expectations of contractors and partners is clear.
Data Collection & Use	Services have requested workshops to strengthen understanding of the legal basis for sharing, data flow mapping, privacy notices and Data Protection Impact Assessments.	The IG Team will deliver Information Sharing, DPIA, Information Asset Register and Privacy by Design workshops. The IG Team will include data flow mapping guidance within all other workshops and provide targeted data flow mapping presentations to specific services.
Retention & Disposal	Services have requested a clear, corporate approach to retention & destruction schedules. Clear guidance on retention of emails and electronically stored documents has also been requested. Services have asked for help to identify where historic files are stored following service changes etc. Help from IT is also requested when services need support with the large database systems.	The IG Team has reviewed and published retention & destruction schedule guidelines – these will be promoted through the Council's Spotlight messaging service. The IG Team has created guidance on retention of electronic documents and this is available on the Council's Intranet The Council's GDPR Implementation task group has created a records task group to review electronic databases. The IG Board is developing an Information Governance & Management Strategy to support the ongoing use and storage of information by the Council.
Individual's Rights	Services need corporate guidance around how to manage GDPR Information requests. There is a requirement to have a corporate GDPR statement on emails.	The IG Team will publish guidance on GDPR information requests and send accompanying Spotlight message The IG Team will create a GDPR statement and work with IT to have this automatically deploying onto emails
Information Security	The electronic Information Security Incident form is working very well, with Services reporting incidents through this route very easily. Some services report that they are unsure as to how to create their service incident response plans Some Services need more information about the Council's Information Security	The IG Team will deliver an online video and guidance around how to create a service incident response plan The IG Team will publish a Spotlight training on the Information Security Policy

	Policy	
Systems & Technology	Services have asked for specific support and guidance from IT, covering: • How to manually delete large amounts of data from large databases • Ways to share data electronically without using email • How do services technically cleanse data from drives	IT are producing guidance and support mechanisms to help Services with their enquiries.
Training & Awareness	All Services are encouraging their staff to complete the GDPR training before the December 31st deadline	GDPR training for non-office based staff is being promoted to managers to ensure all staff have completed GDPR training by December 31st