



Pensions Board

2 July 2015

Report title	Information Governance	
Originating service	Pension Services	
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Recommendation for noting:

The Pensions Board is asked to note:

1. The information governance work being undertaken by the Fund.

1.0 Purpose

- 1.1 To update the Pensions Board on the work being undertaken by the Fund in relation to information governance.

2.0 Background

- 2.1 Information Governance ensures that organisational information is managed as an asset to ensure that all statutory, regulatory and best practice requirements are met. It covers information security, data quality, records management, data protection, freedom of information, environmental information regulations and information governance management.
- 2.2 Currently, Wolverhampton City Council, as Administering Authority (and registered with the Information Commissioner's Office (ICO) as a *Data Controller*) is responsible for the Fund's information governance. The Fund processes personal data on behalf of the Council (as a *Data Processor*) and as such holds information for all members of the pension scheme, currently in excess of 270,000 accounts.
- 2.3 During late 2014, discussions with solicitors suggested that the Fund needed to register as a data controller in its own right, however follow up discussions with the ICO directly, determined this was not the case.
- 2.4 Through this and officer attendance at the Council's Information Governance Board, the Fund identified during late 2014, the need to improve its information governance and accordingly tasked the Governance Team with undertaking the programme listed below, of work to achieve this.

3.0 Governance structure

- 3.1 Discussions were held with the Council's Scrutiny and Transparency Manager and taking on-board the Council's experience and benchmarking across the country, it was identified that, in order to effectively carry out its role as Data Processor and meet its obligations, the Fund should have in place:-

- **An Information Governance Policy**

An Information Governance Policy provides guidance on information governance. It sets out objectives, scope, regulatory requirements and responsibilities. It also provides a Framework to ensure the Fund meets its obligations for the effective management of information, covering areas such as freedom of information, data protection, records management, information security and quality.

The Fund's Information Governance Policy can be found at: -

<http://www.wmpfonline.com/ig>

- **An Information Governance Working Party**

The Information Governance Working Party provides high level oversight and support to the Senior Information Risk Owner (SIRO) and Strategic Director of Pensions. It determines the long term information governance strategy, monitors progress against strategy and provides assurance that information risk is being properly assessed, controlled and mitigated.

- **An Information Governance Operational Group**

The Information Governance Operational Group consists of subject matter experts and provides operational support to the organisation and the Information Governance Working Party and is responsible for ensuring that any tasks commissioned by the Working Party are effectively implemented.

The governance structure, terms of reference for the Working Party and related definitions, roles and responsibilities, can be found at <http://www.wmpfonline.com/ig>.

3.2 The Working Party and Operational Group met for the first time on 9 June and 10 June respectively, where it was agreed that the key tasks were:-

3.2.1 The implementation of a **clear desk policy** by 1 October, to include consideration of:-

- What information is held manually and electronically and how long the information needs to be retained before it can be destroyed; and
- What extra storage capacity is needed both physically (e.g. filing cabinets) and electronically.

3.2.2 The formation of an **Information Asset Register** by 1 December, to account for information assets containing service user information, so that in the event of damage, destruction or loss, there is awareness of what information is affected and, in the case of loss, whether the information held on the asset is protected from unauthorised access.

3.2.3 The implementation of an **Information Risk Assessment and Management Programme** by 1 December, to ensure that the Fund (and any suppliers) identifies, implements and manages controls to monitor and reduce the risk to the organisation, its person identifiable information and critical information assets.

4.0 Training

4.1 To improve *data protection* and *freedom of information* awareness, Senior Managers and Team Leaders received external training tailored specifically to the Fund.

4.2 In addition, this training was cascaded to all staff at a Staff Briefing in February.

5.0 Transparency code

- 5.1 In 2014 the Department for Communities and Local Government (DCLG) issued *The Local Government Transparency Code*. The code was issued to meet the government's desire to place more power into citizens' hands to increase democratic accountability and make it easier for local people to contribute to the local decision making process and help shape public services.
- 5.2 The code stipulates information which should be published quarterly by local authorities, the most relevant areas for the Fund being:-
- Expenditure exceeding £500
 - Government procurement card transactions
 - Procurement information
- 5.3 The Fund is fully compliant with the code and has its own area on the Council's Datashare website.

6.0 Communication

- 6.1 In March an area was added to the Fund website, explaining information governance and showing links to all the policies.
- 6.2 In May, as part of an initiative to continually remind staff about the importance of information governance, a top ten list of tips for data protection was e-mailed to all Fund staff and displayed on posters in work areas. Each month an e-mail will be circulated to Fund staff, based on a topic or theme. The topic for June will be clear desk policy.

7.0 Staff access levels

- 7.1 During March, the team began a programme of reviewing staff access levels across all Fund systems, to ensure that staff have the appropriate level of access for their roles and duties. Two out of eight systems have so far been reviewed and amended, with training provided where necessary. These two systems are *Rota*, the Fund's working hours recording system and *Net2*, the Fund's door access system.

8.0 Information Technology

- 8.1 The team has been working closely with the Council's IT department to ensure that any security weaknesses are addressed and that its business continuity plan is able to fully support the Fund in the event of an incident. In July, a social engineering exercise will take place to test the robustness of the Fund's physical security.

9.0 Information Governance (IG) Toolkit

- 9.1 In December, the Fund's information governance will be audited by an external company, *Dilys Jones Associates*. The Fund is aiming to achieve "assurance" in the audit, which is a nationally recognised standard of information governance.
- 9.2 Between now and December the team will be using an IG toolkit provided by *Dilys Jones Associates*, bespoke for the Fund, to make sure all policies and procedures are in place to meet this standard.
- 9.3 The toolkit will enable the Fund to measure its performance against the information governance requirements and covers areas such as:-
- Management structures and responsibilities
 - Confidentiality and data protection; and
 - Information security

10.0 Financial implications

- 10.1 As the Fund implements a clear desk policy, temporary staff may need to be employed to assist in scanning and destruction of documents. The Operational Group will assess the level of support needed.
- 10.2 In addition, there is a resource implication to the Fund in setting up and adopting these policies and processes; however this will need to be absorbed by Fund staff as part of their current duties.
- 10.3 Failure to comply with information governance requirements could result in a breach which could amount to a significant financial penalty from the ICO which will need to be borne by the Fund.

11.0 Legal implications

- 11.1 As a data processor, processing personal data on behalf of the Council (the data controller) the Fund is obligated to meet information governance requirements. Failure to comply would mean falling foul of legislation which would leave the Fund open to challenge.

12.0 Equalities implications

- 12.1 There are no equalities implications.

13.0 Environmental implications

- 13.1 The clear desk policy should ultimately reduce paper use, as it encourages electronic over paper working.

14.0 Human resources implications

14.1 Within information governance there are key roles which have to be fulfilled. These roles are identified within the IG Working Party terms of reference along with the recommended posts which should fulfil them. These are:

Role	Responsible Post
Data Processor	Strategic Director of Pensions
Senior Information Risk Owner (SIRO)	Head of Governance
Caldicott Guardian (Adults)	Service Director, Older People
Qualified Person	Head of Governance
Public Interest Test	Head of Governance

14.2 Where a post is vacant or the incumbent is unable to act, the person undertaking that role shall be responsible.

15.0 Corporate landlord implications

15.1 There are no corporate landlord implications.

16.0 Schedule of background papers

16.1 Data Protection Act 1998

<http://www.legislation.gov.uk/ukpga/1998/29/contents>

16.2 Freedom of Information Regulations 2000

<http://www.legislation.gov.uk/ukpga/2000/36/contents>

16.3 Environmental Information Regulations 2004

<http://www.legislation.gov.uk/uksi/2004/3391/contents/made>

16.4 Pensions Committee 18 March 2015 Information Governance report

<http://wolverhampton.moderngov.co.uk/ieListDocuments.aspx?CId=186&MId=4115&Ver=4>

16.5 Pensions Committee 10 December 2014 Information Governance report

<https://wolverhamptonintranet.moderngov.co.uk/documents/g4114/Public%20reports%20pack%2010th-Dec-2014%2013.30%20Pensions%20Committee.pdf?T=10>

17.0 Schedule of Appendices

None