Information Governance Board – Agenda

Governance and Ethics Committee are being asked to receive an update on progress for the period April 2023 to December 2023 covering the following:

- Summary Statement for the nine-month period
- Performance update for the period (April to October 2023 only)
- Update on identified risks
- Forward Plan/Current work plan

This report was received by the Information Governance Board/SEB on 19 December 2023

Summary Statement - April to December 23

For the reporting period April to December 2023, we can confirm the following :

- Continued compliance with statutory duties under UK GDPR, Data Protection and Freedom of Information legislation
- Performance level within the 90% ICO standard (up to October 2023)
- Information risks and incidents have been managed and mitigated as usual. Only one incident was reported to the ICO; currently awaiting decision
- Met our Data Security and Protection Toolkit (DSPT) standards - no actions required
- Continuous support and collaborative work with Leadership teams and high-profile projects
- Continued support to traded services – schools, WH, TMOs and WV Living

IG Performance - April to October 2023

90.1 %
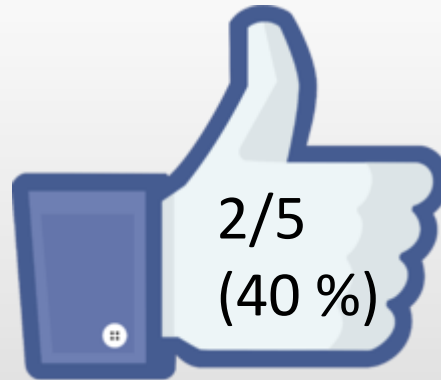
835 requests received and processed

69 Information incidents reported, recorded, assessed and managed –
1 escalated to ICO –
Outcome –1 TBC

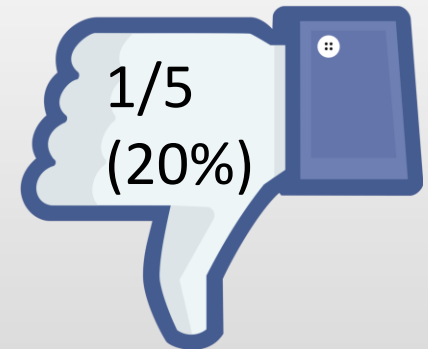**524 Data Protection requests received and processed**

96.0 %

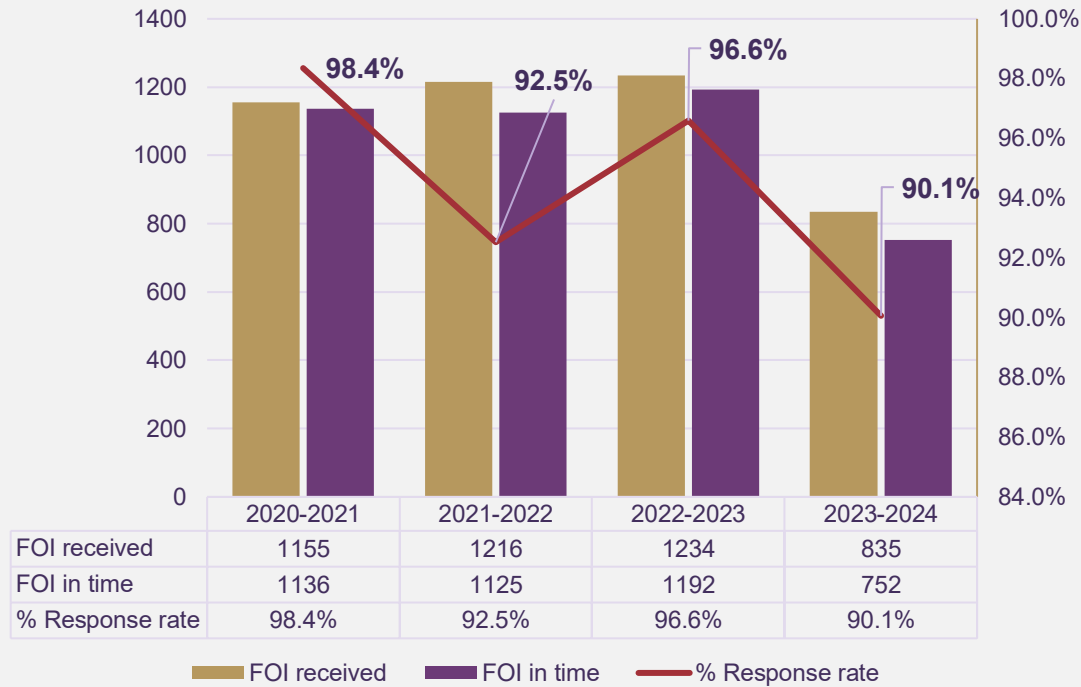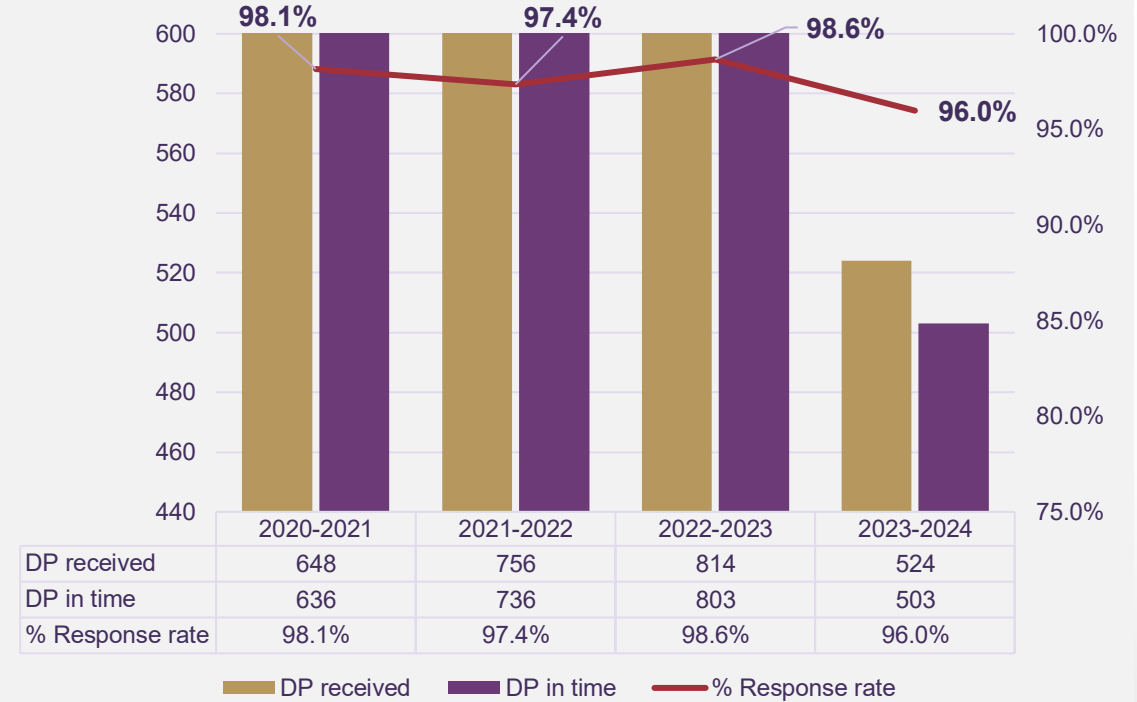2/5 (40 %)

5/1428 (<0.4 %)

1/5 (20%)

ico.
Information Commissioner's Office

tribunal

2/5 (40%)

Performance - Information Requests

FOI Performance - Four Year Annual Comparison

	2020-2021	2021-2022	2022-2023	2023-2024
FOI received	1155	1216	1234	835
FOI in time	1136	1125	1192	752
% Response rate	98.4%	92.5%	96.6%	90.1%

FOI received   FOI in time   % Response rate

DP Performance - Four Year Annual Comparison

	2020-2021	2021-2022	2022-2023	2023-2024
DP received	648	756	814	524
DP in time	636	736	803	503
% Response rate	98.1%	97.4%	98.6%	96.0%

DP received   DP in time   % Response rate

- 92% of requests for information on both regimes have been responded to on time since 1 April 2023; this is a drop in overall performance of 5%.
- The response rates for FOI requests has had the most effect on the overall figure; the introduction of a new case management system for complaints combined with capacity issues in certain service areas may have contributed to the decrease. Quality reviews are being conducted with case officers to identify any training requirements and the figures will be closely monitored to ensure they do not drop below the 90% standard of the ICO.

Corporate Performance – Information Incidents

- 69 incidents reported from April 23 to November 23
- One breach was risk assessed that required reporting to the ICO –still awaiting decision
- Human error in sending emails and post to an incorrect recipient continues to be the main cause. This equates to 70% of all breaches reported for the period – lower than the figure last year (83%)
- Six cyber incidents have been reported so far (four reported last year)
- The current incident reporting process was reviewed to include more focus on Cyber incidents. Communications and awareness raising on Cyber has taken place.
- Training and awareness continues through leadership updates; where targeted training is identified this is undertaken with each specific service. Increased training may have resulted in more reporting of incidents

Number of incidents to Annual Comparison 2019-20 to present

Year	Number of incidents
2019-2020	123
2020-2021	79
2021-2022	77
2022-2023	89
2023-2024	69

Legend: ● Number of incidents ⋯⋯ Linear (Number of incidents)

Cyber & Non-Cyber Incidents

Category	Value
NC - Other	15
NC - Post	15
NC - Email	33
Total non-cyber (NC)	63
Total cyber (C)	6
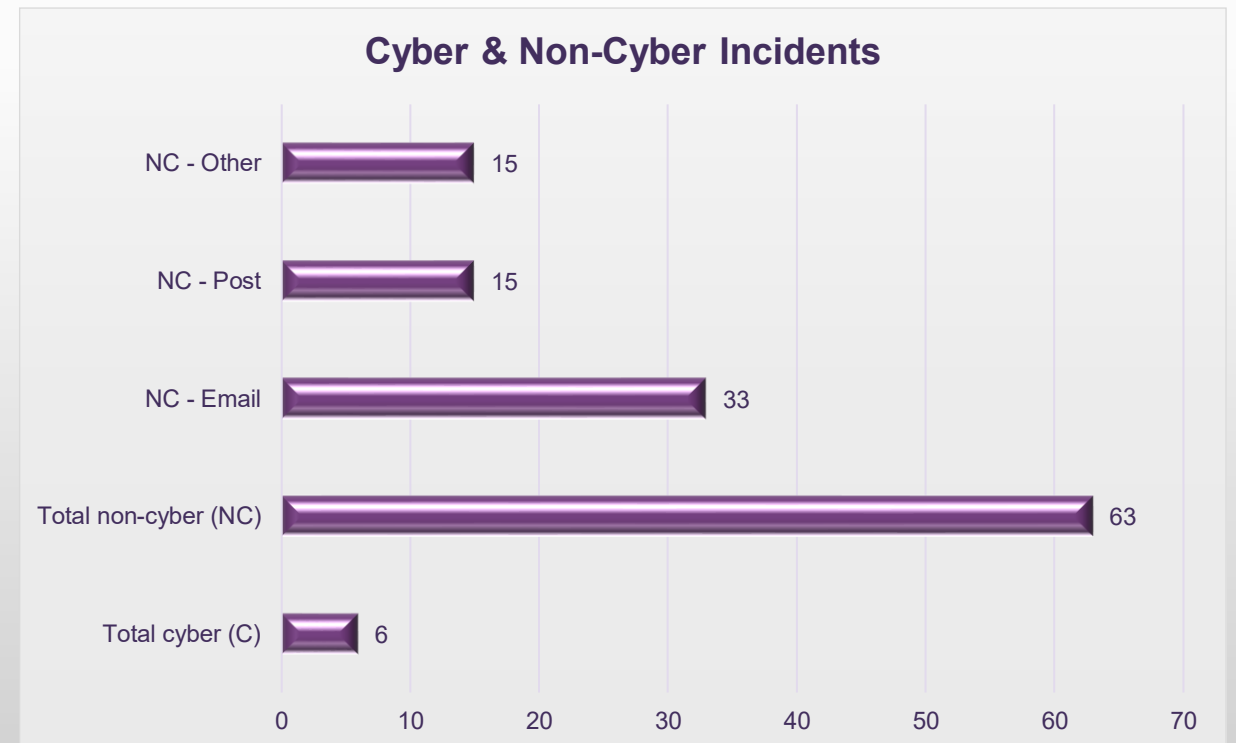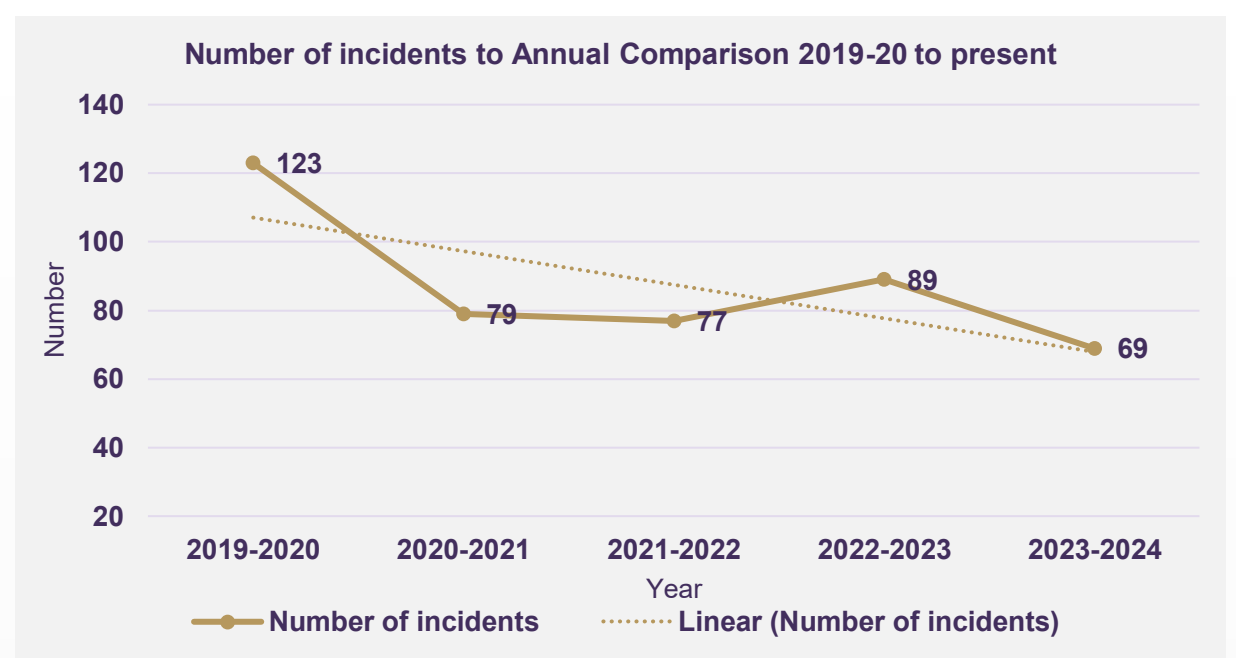
Information Governance Risks

Information governance risks are scored using the RAG matrix which is also used across the council for risk management and data breaches.

- As at November 2023 there is an entry for information governance on the Council's Strategic risk register in relation to operational and technical measures

6
Previous score

16
Current score

12
Target score

Areas to monitor – 2023/2024

Records Management & digital continuity

Supply chain/data processors – Cyber incidents

Changing landscape of Cyber security

IG Workplan 2022/23 – priority areas – Rag Status

Priority work activities		Period April 2023- December 2023 – Progress to date
Information Sharing Q2-Q4	Undertake a comprehensive review of the current city-wide Wolverhampton Information Sharing framework and present findings to IG Board.	• Review started on IS framework and templates in Q2 • Work stopped due to other commitments, but to resume in Q4. Timeframes may need to be reset for the new financial year. Possible delay
Corporate IG Awareness Raising All Year	Formulate a rolling corporate IG communication and awareness plan: • Routine updates on IG climate and provide additional learning • Key updates on activities/incidents within the cyber and information security environment; linking with new Digital & IT Cyber action plan	• A rolling Communications plan has been developed and live for the 12-month period. Completed and continued
Policies Quarter 3 & 4	• Undertake a scheduled review of five policies completed on time • Undertake a review of level two procedure documents and complete any remaining procedures to support the new IG policy framework.	• Scheduled review of five policies completed on time Completed. • 21 procedure documents are due for scheduled review in Q4 – on track
IG intranet All Year	Development and completion of IG intranet pages; digitalise forms and templates and include a repository for DPIAs, ISAs, PNs and IG level two procedure documents.	Work has started on creating new IG pages - IG section on Governance portal has been updated to reflect this and is live. IG Site is a work in progress and will continue to be updated as we develop further pages throughout the year. On track.
Records Management Quarter 3 – 4 2024/2025	Continue to embed the existing culture of change from manual to digital processes. To include: • Collaborative work with Audit Services – review of MS Teams and records retention (started); • MS Teams Audit report actions present findings and action plan to IGB as appropriate. • Longer term action plan being developed	• Audit undertaken and report findings presented to SEB/IGB – Completed • Collaborative work with Digital & IT started - Action plan created and requirements on track to be completed by Q3 and Q4 respectively. On track • Longer term action plan started, and principles agreed with IGB/SEB
Supply Chain/ Data Processor Q3 – Q1 2024/25	Review and refresh current internal processes around use of suppliers/data processors.	• On track for Q1 2024/25
Training Q1 – Q4	Roll out level two and three role-based training	• Delayed but re-prioritised for Q4

Questions