

Information Governance

12 January 2023

Update to Governance and Ethics

Committee –

Progress April 2022 to December

2022

Purpose – Agenda

Governance and Ethics Committee are being asked to receive an update on progress for the period April 2022 to December 2022 covering the following:

- Summary Statement for the nine month period
- Performance update for the period (April to November 2022 only)
- Update on identified risks
- Forward Plan – Work plan 22/23 - 23/24

This report was received by the Information Governance Board/SEB on 13 December 2022



Eight Month Summary Statement

April – November 2022

For the reporting period April to December 2022, we can confirm the following :

- Continued compliance with statutory duties under UK GDPR, Data Protection and Freedom of Information legislation
- Improved performance – now back above 97% across both regimes (up to November 2022)
- Met our 21/22 Data Security and Protection Toolkit (DSPT) standards – no action plan required
- Information risks and incidents have been managed and mitigated as usual. Only two incidents were reported to the ICO; both no further action (NFA)
- Continuous support and collaborative work with Leadership teams
- Continued support to traded services – schools, WH, TMOs and WV Living



IG Performance - 1 April 2022 to November 2022



97.4 %
780 requests received and processed

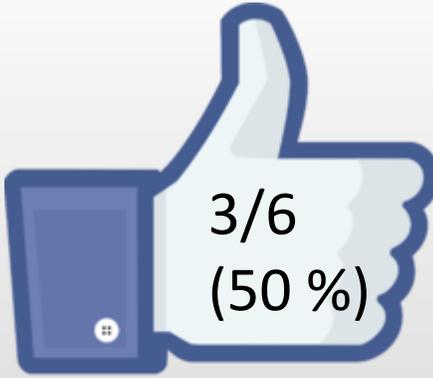


53 Information incidents reported, recorded, assessed and managed –
2 escalated to ICO – Outcome – 2 NFA



496 Data Protection requests received and processed

98.8 %



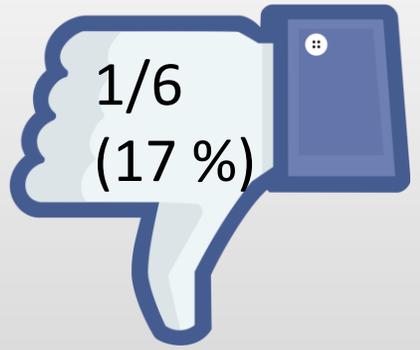
3/6 (50 %)



6/1329 (<0.5 %)



2/6 (33 %)

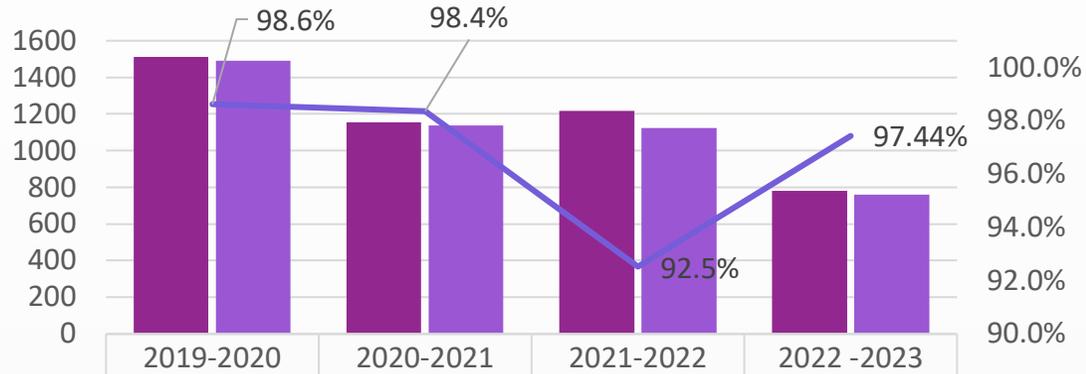


1/6 (17 %)

Performance - Information Requests



FOI Performance - Annual Comparison



FOI received	1513	1155	1216	780
FOI in time	1492	1136	1125	760
% Response rate	98.6%	98.4%	92.5%	97.44%

FOI received FOI in time % Response rate

DP Requests Performance - Annual Comparison



Received	695	648	756	496
Responded	690	636	736	490
Responded %	99.3%	98.1%	97.4%	98.8%

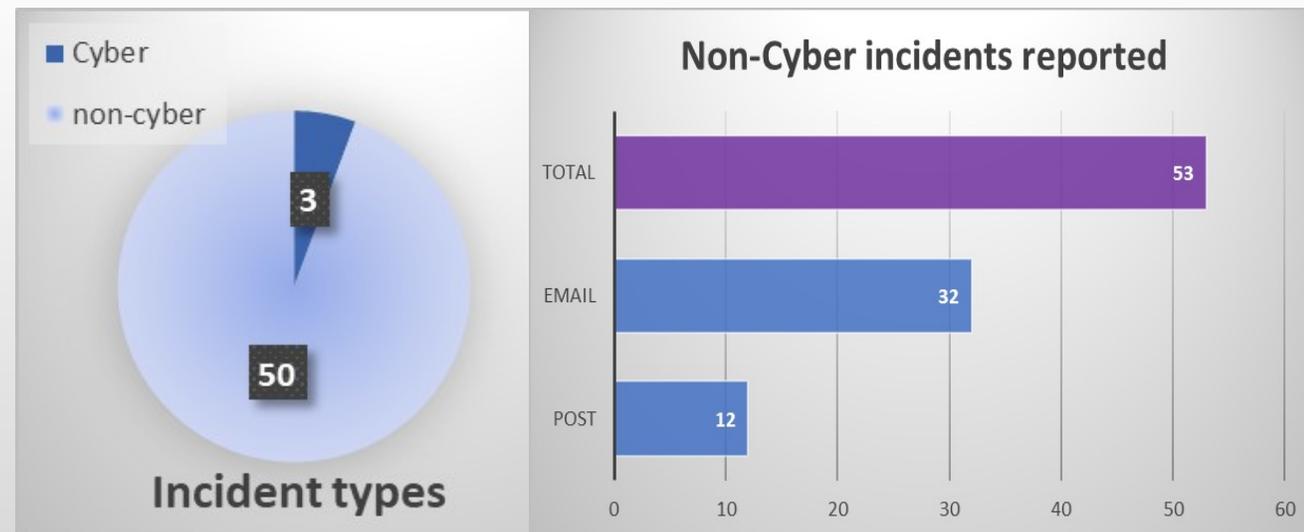
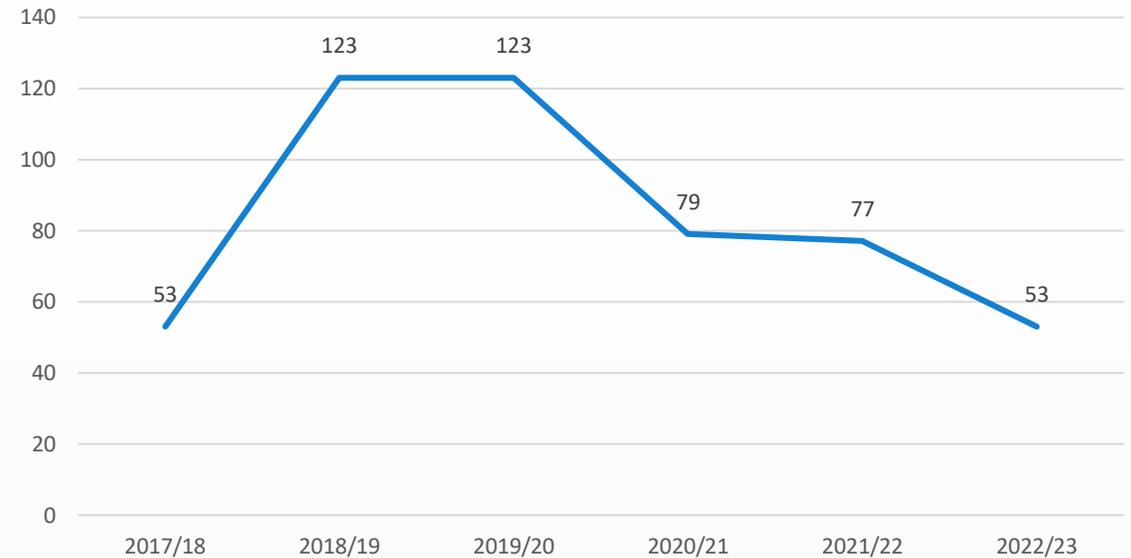
Received Responded Responded %

- Performance has improved since this point last year; now back to above 97% performance rate across both regimes. Mid term mitigations have proved to have a positive effect – resource in place until May 23
- Combined statistics – this year - (DP & FOI) 98.% compared to last years combined figures of 94.3%. This equates to a 3.5% increase.
- Projected received figures for both regimes is estimated to be 15-20% lower than previous years – the reason for this is unknown.

Corporate Performance – Information Incidents

- 53 incidents reported since April 22 to November 22 (comparable to previous years)
- Two breaches was risk assessed that required reporting to the ICO – **both confirmed NFA**
 - Failure to use BCC
 - Phishing incident
- Human error in sending emails and post to an incorrect recipient continues to be the main cause. This this equates to 83% of all breaches reported for the period
- Training and awareness continues through leadership updates; where targeted training is identified this is undertaken with each specific service
- IG team is working closely with Digital & IT in relation to Cyber Security

Information Incidents – 2017/2018 to 2022/23



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 2022 there is an entry for information governance on the Council's Strategic risk register in relation to operational and technical measures

5					
4					
3					
2					
1					
	1	2	3	4	5
	Impact				

6

Current score



4

Target score

Areas to monitor – 2022/2023



Records Management & digital continuity

Changing landscape of Cyber security



Monitoring mandatory training compliance



New Data Protection bill



Training - update



Objective

Progress/Next steps

Monitoring & reporting

Develop and implement level 2 & 3 role based training

Level 1
Standard Mandatory -
All employees

Level 2
Roles handling special category data –
Social Care,
Legal, HR, ICT,
IG

Level 3
Specialist roles who own or manipulate data –
I&P, PH and Information Asset Owners (AIO) & Administrators (IAI),

Progress to date:

- TNA carried out
- Categorised the roles that sit beneath to tier two and three categories
- Identified the training requirements for each tier
- Suggested an approach for reporting and monitoring
- Reviewed offerings from Learning Nexus (current provider); consideration of new provider where applicable
- Sat down and reviewed and agreed approach and requirements with OD

Next steps

- Finalise the individual modules per Tier
- Work with OD to ensure back-end functionality (mandates per role and escalation process)
- Develop a communication plan and roll out plan
- Implement training provision via Learning portal
- Monitor and report and escalation



Start of Q4



By end of Quarter 4

Training – approach in detail



Type	Who & When	Roles Covered	Notes
Tier 1	<p>Mandatory – all staff</p> <p>All staff in Tier 1 to complete every two years</p>	<p>All staff</p> <ul style="list-style-type: none"> • Face to Face • Those with access to ICT - Prior accessing any software mandatory training must be done first (inc. refresher/retraining) 	<p>Basic IG – Confidentiality, Looking after records, identifying and reporting a breach, cyber awareness, keeping information secure – sending/retaining/sharing/access to information</p> <p>Basic ICT (content TBC by D&IT)</p> <p>Currently covered in Protecting Information and Cyber Security Module</p>
Tier 2	<p>Targeted – aimed at a select role based audience (effectively anyone who has people reporting to them)</p> <p>All roles identified for Tier 2 to complete interim level IG training every two years</p>	<p>HoS, Managers, Team Leaders, Social Workers, Audit, Customer Services, Elections, HR (non Business partners), Agresso, Rev and Bens, Finance, Insurance, Procurement and Commissioning, Project Team, Licencing, Communications, SEN, The Hub, Lawyers, Emergency Planning, Public Health, ICT, CCTV (Inc control centre)</p>	<p>Intermediate IG –</p> <ul style="list-style-type: none"> • Detailed DP - Confidentiality, SAR Handling, Information Sharing, Data Breaches – identifying and reporting, DPIAs, Privacy Notices, Legal Basis, Disclosure types • Basic FOI- handling and reporting, approvals, basic exemptions • Records Management - retention schedules, asset registers, process
Tier 3	<p>Specialist training for specialist/technical roles</p> <p>Specialist roles – all roles identified to complete the Advanced IG training - every two years</p> <p>Technical training - all roles identified to complete specific training within a timeframe identified for role (e.g. annually)</p>	<p>Technical roles DPO, SIRO, Caldicott, Directors and Asst Directors, Cyber Officer (CIO),</p> <p>Specialist Roles Children and Families Lawyers, Social Care Managers, ICT Specialist (security, Architecture, design etc), Data Analytics, HR business partners, Senior Insurance, RAA, SEN Managers, IG and Customer Liaison, Asset Owners, RIPA Approvals</p>	<p>Advanced IG will cover</p> <ul style="list-style-type: none"> • FOI/DP qualification • Detailing sharing and disclosure training • Information Risk management <p>Technical training – as required for each role</p>

Policy Framework - update



Completed

In progress/next steps

Level 1 – external policy documents

CITY OF
WOLVERHAMPTON
COUNCIL

19



5

Five policies published and live for general public (and employees)



Level 2 – Internal procedures

26

Level 2 Procedure document drafted



21

Procedures published on intranet for staff to access



- Continue to collaborate with Digital I& IT on ICT on information security themed initiatives and linked procedures
- Finalise and publish the remaining five linked procedures
- Communicate and signpost employees to the new procedures



5

Procedures still in progress and dependent on Collaboration work with D&IT



Leadership Update



- Continuation of adhoc support and guidance.
- Leadership meetings attended -
 - Update on FOIS/SARS/Breaches/Training
 - Update on trends and themes
 - Priority work discussions
 - Forward planning - Training themes and key projects
- Support on generic IG - DPIAs, Privacy Notices, DPIA support, information sharing and policy development
- Targeted support and contribution to projects and initiatives and delivery of training



Leadership Work – enabling, informing & supporting



Adults – families
Front Door



Children & Education
Adoption Finance T&F
Letterbox A@H T&F



Children & Education
Digital Approach T&F



Children & Education
SWIS



Children & Education
RRR – reducing repeat
removals



Children & Adults –
Integrated Care
Management
Solutions



Governance –
Staff benefits



Children & Education
ISA with Schools



Children & Education
Sen Transitions



Children & Education
Family Hubs & Start
for Life



Governance –
HR compliance check



Governance –
Electoral Register Portal



City Assets –
Third party
Civic Centre usage



Regeneration –
FOI/EIR guidance &
Engagement process



Digital & IT–
MDM,
Omni Channel
Replacement Contact
Centre



Data & Analytics
LIFT



Governance –
H&S Risk Register



Public Health
Health Checks/DPIA
support



Digital & IT–
Cyber security plan

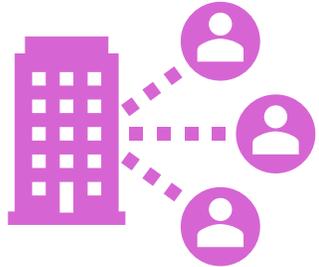


Housing- support – TMOs,
WV Living, WH

Collaborative leadership, council & city wide work

— enabling, informing & supporting

Collaborative Working – once Council



- Digital & IT
- Data & analytics
- Information Governance

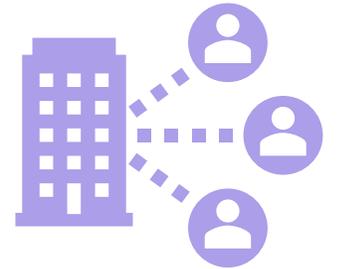
- MS Azure Labels – information rights management
- Bring Your Own Device (BOYD)
- Phishing Campaigns
- MS Teams
- FOI – process improvement
- FOI – transparency agenda – publish data sets
- Supporting the Data Strategy across the council

Forward Planning

- more strategic collaboration and roadmap alignment
- Widen scope

Wider collaborative working & corporate support

Multi-leadership teams



- Youth unemployment 18-24 – project and programme support
- City ideas fund
- Ignite project
- Traded Services (education) programme Board
- PH and Social Care – COPI expiry
- Omni-channel/master data management

City Wide partnership working

Working with local and regional health partners –

- Place Based Partnership One Wolverhampton Governance & Informatics group
- Black Country & West Birmingham IG group
- Information Sharing Gateway



IG Workplan 2022/23 – 2023-2024 – priority areas

Priority Work activities	Period 2022-23/24 Deadline	
Information Asset Registers	Continuous Activity: Continuation of review and consolidation of IARs with the updated template with leadership teams; review and update ownership and disposal schedules accordingly.	All year
Training	<p>In progress: Introduce scheduled themed/topic training; scheduled e-bytes; drop-in sessions and surgeries - develop a linked strategy with Organisational Development</p> <p>In progress : tiered training - closely monitor uptake throughout the year. Collaborative work with Digital & Analytics and Operational Development to build a robust monitoring mechanism.</p> <p>In progress : include training progress reporting in leadership quarterly update meetings</p>	Q2 – Q4 Q4 Q1- Q4 2023-24
Policies	Near completion : Finalise remaining five procedure and guidance documents to support framework. Publish on intranet when complete	Q4
IG intranet	Not started: Development and completion of IG intranet pages; include a repository for leadership documents. Governance portal provides a temporary repository	All year
Records Management	In progress: Programme of work to be developed covering digital continuity, records retention and system migration. Potential programme approval to be sought from IGB once developed	Q1-Q4 2023-2024
Collaborative working	In progress: Continued collaborative working with Data & Analytics, Digital and IT, Operational Development. Align road maps and strategies	All year

Key milestone activities only – other work progressed through Leadership working

IG Forward plan – key activities/milestones



Our Assets



Our Data



Our Digital



Our Money



Our People

Q3 2022/23	Q4 2022/23	Q1 2023/24
Quarterly leadership meeting progress update	Quarterly leadership meeting progress update	Year end Round up - Leadership progress report
Level 2 procedure documents completed and published for all staff to access	Training – Tier 2 & Tier 3 training modules implemented Tier 1 performance census	Collaborative working – strategic roadmap alignment with Data & Analytics, Digital & IT approved
Training – Tier 2 & Tier 3 training modules finalised; back-end functionality requirements finalised	Collaborative project/work packets delivered Azure Classification Action plan – rollout	Records management strategy drafted Approval from SIRO & IGB – mid Q2 update
Eight month IG Progress update report to Governance & Ethics 12 Jan 23	Collaborative working – roadmap alignment drafted with Data & Analytics, Digital & IT	2022/23 Annual SIRO report & 6 month progress report – initial draft

KEY

IG Framework	Reports	Projects	Ongoing Compliance
--------------	---------	----------	--------------------

Questions

