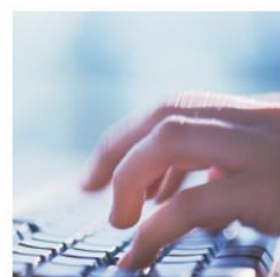




Information Management and Governance Strategy (Delivery Plan) 2016 - 2018

Craven District Council



'Craven District Council aims to develop a culture amongst officers and elected members that properly values, protects and uses information for the benefit of the Council, its residents and other customers, and at the same time respects the rights of those who seek to obtain information about the Council'

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Craven District Council

Information Management and Governance (IMG) Strategy Implementation

Introduction

Craven District Council has developed a strategy which sets out the Council's high level-plans for Information Management and Governance over the coming years to 2018.

This Delivery Plan demonstrates the means of implementing the Strategy's six Strategic Themes and the 10 detailed objectives of the Strategy.

Strategic Themes

The Strategic Themes are as follows:

- Improving Information Governance
- Protection of the Council's information (including personal data)
- Promoting employees' and elected members' responsibility to protect personal data of residents, customers, employees, etc (e.g. by providing training and awareness)
- Providing effective and timeous management of requests for information
- Promoting effective information sharing and maximising the use of information for the public good
- Improving compliance

Strategic Objectives

The 10 detailed objectives of the Strategy are as follows:

1. Establish a suitable and proportionate information governance regime, including improvements to accountability throughout the Council, and supporting the Information Management Group and the Audit and Governance Committee.
2. Improve the Council's culture for employees and elected members so that information is properly valued, protected and better used, and support the introduction of HR policies that support this aim.
3. Establish and deploy best practice information management policies, standards and procedures that are consistently applied across the Council.
4. Ensure that the Council's legal obligations in the handling, storage and use of personal data are fully complied with (under the Data Protection Act).
5. Ensure that the Council's legal obligations in the provision of information in response to requests are fully complied with (under the Freedom of Information Act, Environmental Information Regulations, Reuse of Public Sector Information Regulations, and the Data Protection Act).
6. Support the development of technical information procedures and practices to ensure that information held and processed is accurate, up-to-date, complete, and readily available when required.
7. Support the sharing of information with other public services partners so that the maximum public benefit can be achieved so enhancing public services through greater access to information (within the law).
8. Comply with the requirements of the Transparency Code.
9. Ensure that outstanding recommendations made in previous audit reports are implemented, and that future recommendations are properly tracked and implemented.
10. Ensure that a periodic assessment can be conducted so as to provide assurance to the Corporate Leadership Team and Audit and Governance Committee that improvements are progressing at an appropriate pace.

The remainder of this Delivery Plan explains how we aim to achieve these objectives.

1. Establish a suitable and proportionate information governance regime, including improvements to accountability throughout the Council, and supporting the Information Management Group and the Audit and Governance Committee.

No	How we will achieve this	Measures	Scheduled
1.1	Improve accountability at appropriate senior level.	Establish an Information Management Group (IMG) of senior officers, which is chaired by the Senior Information Risk Owner (SIRO), and meets at least quarterly.	May 2016
1.2	Report to the Council's Senior Board.	Provide a quarterly report of progress to the Council's Corporate Leadership Team (CLT).	From June 2016 (quarterly thereafter)
1.3	Improve ownership and the management of risk to the Council's information assets.	<p>Appoint Information Asset Owners (IAOs) across all Council Services.</p> <p>Create and regularly monitor a comprehensive Information Asset Inventory.</p> <p>Provide appropriate training to the SIRO and IAOs.</p> <p>Develop and maintain an inventory of information sharing agreements.</p>	<p>May 2016</p> <p>From April 2016</p> <p>From April 2016 to June 2016</p> <p>From July 2016</p>
1.4	Report to the Audit and Governance Committee.	Provide periodic reports of significant issues to the Council's Audit and Governance Committee, and an annual report on progress of implementation of this Delivery Plan.	From April 2016

2. Improve the Council's culture for employees and elected members so that information is properly valued, protected and better used, and support the introduction of HR policies that support this aim.

No	How we will achieve this	Measures	Scheduled
2.1	Policy and guidance framework	<p>Ensure that the Council has a set of comprehensive Information policies and guidance (covering security, data protection and access to information).</p> <p>(See Appendix 1 for provisional policies structure)</p> <p>Ensure that policies are communicated in an appropriate manner across all officers and members.</p>	<p>May 2016</p> <p>May 2016</p>
2.2	Promoting individual awareness	<p>Provide appropriate awareness to newly appointed officers, and other workers, and offer this to elected members.</p> <p>Provide regularly updated awareness or training to all officers, and offer refresher training for elected members.</p>	<p>Upon induction</p> <p>Individual awareness must be updated every two years</p>
2.3	Incident reporting	Provide mechanism and guidance for reporting and managing information risk incidents.	April 2016
2.4	Communications	Provide user-friendly communications through the Council's Core-brief newsletter, and other mediums, via e-mails, awareness campaigns, presentations and posters (for example).	Monthly Communication Plan
2.5	Supporting colleagues	Provide visible support and encouragement, and advice where appropriate to individual employees who have difficulty in adopting an appropriate culture.	As required

2.6	Compliance	<p>Conduct regular compliance checks (e.g. in silent hours) and report failures to senior management.</p> <p>Review the Council's disciplinary policies in relation to information management and recommend changes where appropriate.</p>	<p>From April 2016(quarterly reviews at IMG)</p> <p>June 2016</p>
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3. Establish and deploy best practice information management policies, standards and procedures that are consistently applied across the Council.

No	How we will achieve this	Measures	Scheduled
3.1	Develop a comprehensive policy and guidance framework	<p>Identify a list of relevant policies covering information management and security, data protection and access to information (the policy framework).</p> <p>Seek approval for the policy framework from the IMG.</p> <p>Draft policies and submit these for approval on an ongoing basis to members of the IMG.</p>	<p>April 2016</p> <p>May 2016</p> <p>As required (quarterly reviews at IMG)</p>
3.2	Clear and accessible guidance	Ensure that all guidance on policy implementation to officers and members is clear and accessible.	From April 2016
3.3	Compliance	<p>Perform periodic compliance checks to test effectiveness and employee understanding of policies and guidance.</p> <p>Periodically monitor employee understanding, for example, by use of short answer tests or quizzes, etc.</p>	<p>May 2016 (six monthly thereafter)</p> <p>From June 2016</p>

4. Ensure that the Council's legal obligations in the handling, storage and use of personal data are fully complied with (under the Data Protection Act).

No	How we will achieve this	Measures	Scheduled
4.1	Physical security	<p>Encourage greater awareness of the need to protect information and other assets in Council buildings.</p> <p>Promote the need to lock away personal and other sensitive information (and valuable assets) overnight.</p> <p>Support open-plan working and shared office facilities by provision of appropriate guidance and advice to ensure privacy is respected and proportionate security maintained.</p> <p>Recommend a review of the access controls operating in BVS.</p> <p>Conduct regular risk reviews and report to CLT.</p>	<p>From April 2016 (quarterly reviews thereafter at IMG)</p> <p>From April 2016</p> <p>From April 2016</p> <p>June 2016</p> <p>From April 2016</p>
4.2	Privacy	<p>Support the construction of Privacy Impact Assessments (PIAs) where new initiatives or changes involving personal data are proposed.</p> <p>Develop a single Privacy Notice for use across all Council services.</p>	<p>Ongoing</p> <p>July 2016 (ICO review underway)</p>
4.3	Data sharing	Ensure that data sharing arrangements comply with the	From April 2016

		law and ICO advice. Review data sharing agreements, including the method of transfer.	(with annual review thereafter) October 2016
4.4	Secure disposal	Review local arrangements for the disposal of sensitive waste, and monitor operational arrangements across all Council sites.	From May 2016
4.5	Contract clauses	Review all contracts with third party suppliers to ensure that appropriate clauses are in place outlining the data controller-data processor relationship and responsibilities.	August 2017
4.6	Information Charter	Draft and submit for approval an Information Charter which demonstrates how the Council values and looks after personal information	September 2016
4.7	EU General Data Protection Regulation (GDPR)	Support the Council in the implementation of the GDPR	Expected implementation in 2018

5. Ensure that the Council's legal obligations in the provision of information in response to requests are fully complied with (under the Freedom of Information Act, Environmental Information Regulations, Reuse of Public Sector Information Regulations, and the Data Protection Act).

No	How we will achieve this	Measures	Scheduled
5.1	Requests for information (under DPA)	<p>Provide responses to Subject Access Requests within the appropriate timescales.</p> <p>Respond to other third-party requests for personal information (e.g. from the police)</p> <p>Liaise with the ICO where a Request for Assessment (RFA) or other notice is received.</p>	<p>From April 2016 (quarterly reviews thereafter at IMG)</p> <p>As required</p>
5.2	Requests for information (under FoI Act, EIR and Reuse of Public Sector Information Regs)	<p>Support the Council in ensuring that responses meet the relevant timescales.</p> <p>Assist officers with more complex requests, providing advice and/or draft replies where appropriate.</p> <p>Provide draft and final replies to requests relating to ICT services.</p> <p>Monitor monthly performance providing reports to management as appropriate.</p> <p>Recommend or make changes to the control arrangements where appropriate.</p> <p>Arrange or conduct internal reviews where complaints are received.</p>	<p>From April 2016 (quarterly reviews thereafter at IMG)</p> <p>As required</p> <p>As required</p> <p>Process Established</p> <p>From April 2016</p> <p>As required</p>

		Liaise with ICO where it decides to investigate following complaint from an applicant.	As required
5.3	Record keeping	Retain appropriate records of cases so that the Council's performance can be monitored over time.	Process Established
5.4	Publication Scheme	Review the Council's publication scheme so as to ensure that it complies with the requirements of the FoI Act and guidance from the ICO. Review to check information is up to date.	July 2016 January 2017

6. Support the development of technical information procedures and practices to ensure that information held and processed is accurate, up-to-date, complete, and readily available when required.

No	How we will achieve this	Measures	Scheduled
6.1	Conduct a review of practices across the Council's services	Review is to consider how information is collected, and processed, levels of access and arrangements to protect the information from unauthorised access.	June 2017
6.2	Support to Service Managers	Provide advice and support to service managers in development of information processing and storage arrangements.	As required

7. Support the sharing of information with other public services partners so that the maximum public benefit can be achieved so enhancing public services through greater access to information (within the law).

No	How we will achieve this	Measures	Scheduled
7.1	Data sharing with other public sector partners	Ensure that data sharing arrangements are understood and applied where appropriate.	As required
		Support the Council's membership of the North Yorkshire Multi-agency data sharing protocol, by considering requests for data sharing, and making recommendations where appropriate.	As required
7.2	New data sharing arrangements	Advise and assist with the development of new arrangements, supporting the development of PIAs where appropriate.	As required

8. Comply with the requirements of the Transparency Code.

No	How we will achieve this	Measures	Scheduled
8.1	Publish information in accordance with the (Local Authority) Transparency Code	<p>Review Transparency Code requirements.</p> <p>Compare Craven's published information (on the Internet web pages) with the provisions of the Code.</p> <p>If appropriate Commission additional information from service managers and agree the process of regular updating.</p>	<p>June 2016</p> <p>As required</p>
8.2	Undertake review if appropriate	<p>Check to make sure information is up to date.</p> <p>Review if any changes are made to the Transparency Code</p>	<p>December 2016</p> <p>As required</p>

9. Ensure that outstanding recommendations made in previous audit reports are implemented, and that future recommendations are properly tracked and implemented.

No	How we will achieve this	Measures	Scheduled
9.1	<i>IA 15/16 059 A strategy should be compiled as to the most appropriate way in which to carry out a Council wide review of all data sharing, and arrangements put in place to promptly address this to ensure compliance with the guidelines</i>	Included in items 4.3 and 7.1 above	From April 2016
9.2	<i>IA 15/16 152 The electronic records and the EDRMS phases of the Information Management Project should be progressed</i>	All appropriate documentation is now scanned and saved electronically.	Complete
9.3	<i>IA 15/16 157 A clearly owned information asset inventory should be developed and maintained. Once developed, identified information asset owners should ensure that risks and opportunities are monitored</i>	Included in item 1.3 above	From April 2016
9.4	<i>IA 15/16 217 An Information Management Strategy should be in place to establish how information is managed, published, stored / disposed and used. As part of this a standard data publishing process with nominated officer/s responsible for publishing data should be included.</i>	Incorporated as part of the overall Information Management and Governance Strategy	Complete

10. Ensure that a periodic assessment can be conducted so as to provide assurance to the Corporate Leadership Team and Audit and Governance Committee that improvements are progressing at an appropriate pace.

No	How we will achieve this	Measures	Scheduled
10.1	Annual Review and assurance	Provide six-monthly reports to the CLT and Audit and Governance Committee (on a confidential basis) of the level of information assurance across the Council's core activities.	June 2016
10.2	Lessons learned from incidents	Commission and/or provide recommendations to IAO/SIRO following security incidents involving the Council's information assets.	As required

Appendix 1 – Provisional Policies Structure

The provisional policies structure outlined in section 2.1 is designed to ensure appropriate guidance is in place to give assurance on information security and governance. The policies defined below will be supported by additional guides where appropriate.

Category	Name of Policy
Governance Policies (Define the Council's overarching position on Information Governance)	Information Security
Access Policies (Define the requirements for access to the Council's information and networks)	Access to information User Access Third party access Physical Security System Access
Information Assets Policies (Define the standards that apply to the Council's information assets)	Records Management Information Protection Information Asset Incident/Data Breach Management Information Classification and Handling Retention and Destruction Secure Disposal and Destruction Access to Information (Fol/EIR) Information Risk Management
ICT/Operational Policies (Define the standards that apply to the management of ICT assets)	Portable/Removable Media PSN & PCI-DSS Cyber Security (Encryption / AV / Patching) Forensic Readiness (inc 'Prevent') ICT Backup
User Policies (Define the minimum standards and responsibilities of users who have access to the Council's information)	Acceptable Usage (Internet/Email/Telephone) Administrative Rights Clear Desk Home and Mobile/Remote Working PSN Usage Statement Use of Personal Devices (BYOD)

Document Information

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Purpose

The purpose of this document is to define the Information Management and Governance Delivery Plan for Craven District Council for the period 2016-2018.

Distribution

Copy to	CLT
	SLT
	ICT Staff
	Lead member for Internal Services
	File

Document History

Version	Date of Production	Version Description	Author
0.1	01/03/2016	Initial Draft	DRN
0.2	08/03/2016	Review with DM & Inclusion of policy structure (Appendix 1)	DRN
1.0	21/03/2016	Released for publication following CLT review.	DM

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