

NORTH LINCOLNSHIRE COUNCIL

AUDIT COMMITTEE

INFORMATION GOVERNANCE & IT SECURITY UPDATE – JUNE 2015

1. OBJECT AND KEY POINTS IN THIS REPORT

1.1 To provide the Audit Committee with a position statement on the council’s Information Governance and IT Security functions.

1.2 Key points are:

- The council is required by law to comply with a range of information related requirements.
- An Information Governance Policy Framework with associated policies is in place to support the council in complying with legislative requirements.
- The council has undertaken a number of internal and external assessments, which indicate assurance in its operation of these functions.

2. BACKGROUND INFORMATION

2.1 Information is a key council asset and it is crucial that it is protected with the same care as other critical assets, such as finance, people and land/property.

2.2 The council has a legal obligation to comply with information related legislation, notably the Data Protection Act, Freedom of Information Act and the Environmental Information Regulations. Collectively we refer to these requirements and activities as ‘Information Governance’.

2.3 An Information Governance Policy Framework underpinned by associated policies set out how the council will comply with legislation and good practice. This framework comprises sixteen schedules, as follows:

01	Records Management	09	Re-use of Council Information
02	Humber Information Sharing Charter	10	Publication Scheme
03	Internal Information Sharing Protocol	11	Information Complaints
04	Data Protection and Confidentiality	12	Information Security
05	Caldicott Plan	13	Security Incident and Data Breaches
06	Freedom of Information Act	14	Information Security Classification
07	Environmental Information Regulations	15	Data De-identification
08	Information Request Charging	16	Data Quality Framework

2.4 The following provides the Audit Committee assurance of our compliance with Information Governance legislation and good practice:

- Internal Audit awarded both the Data Protection Act and Freedom of Information Act audits adequate assurance.
- The Information Governance Policy Framework audit received adequate assurance in January 2014.
- The Records Management Framework audit received adequate assurance during May 2015.
- In March 2015 the third successful NHS Information Governance Self-Assessment submission was accepted. This submission is a requirement for organisations that have access to certain health information such as Public health.
- In November 2014, the annual Public Services Network (PSN) compliance certificate was successfully renewed. This is a requirement for any public sector organisation that wishes to be connected to the PSN and provides assurance in terms of IT and information security.
- The council has received no challenges from the Information Commissioner (ICO), who regulates information legislation in the UK, about how the council it is taking care of information.

2.5 The following demonstrates improvement progress over the previous six months:

- The annual review of the Information Governance Policy Framework was completed and approved by the responsible board and Cabinet Member.
- The annual NHS IG Self-Assessment was made March 2015, this time against a newly rationalised list of requirements better tailored to a local authority, reducing duplication with PSN requirements. All requirements were met to the required standard with 13 out of 28 requirements exceeding requirements.
- Information Security continues to be taken very seriously with the continuation of regular council wide communication messages and a standard feature in the Digital newsletter.
- Information Security has been further strengthened in the following areas:
 - Improved user awareness via regular communications
 - Mandatory use of encrypted USB drives if they must be used
 - Implementation of Blackberry BES12 to provide device management for personal mobile devices accessing council email
 - All council laptops have full hard disk encryption as standard.

- Security Classification is necessary to ensure personal and confidential information is stored with an appropriate level of security. A pilot to test this process was completed within the Local Taxation and Benefits function and learning from this training was noted in preparation for a council wide rollout of Security Classification.
- The Information Commissioner's Office (ICO) regulates the Information Governance legislation in the UK. Work has continued to ensure a good relationship with the ICO is maintained particularly around the protection of information.

2.6 Over the coming year the focus on improvements for Information Governance and IT Security will be in the following areas:

- The annual review of the Information Governance Policy Framework will take place January 2016 to ensure that any changes to legislation or good practice are incorporated. This will include a review of the Publication Scheme, to ensure that easy access to routinely published information is maintained.
- The next NHS submission is March 2016. The aim will be to maintain our successful compliance to the required level two standards.
- The 2015 PSN external IT Health will take place over the summer to identify and mitigate any IT security risks.
- IT Service will submit the annual PSN application during October 2015 to gain continued PSN accreditation in the form of a Code of Connection.
- We will further pilot Security Classification, specifically looking at full automation of marking information.
- The further strengthening of the Records Management function will take place, as set out in the Records Improvement Project. Focusing on the enhancement of processes, storage arrangements and future links to other key projects, such as the Electronic Document Records Management (EDRMS) project.
- Information Asset Registers are used to record what information the council holds and include detail such as how, where and for how long the information should be kept. This process will be streamlined during 2015-16 by the introduction of a standard electronic Information Asset Register and other associated forms in the Topdesk system
- Any individual is given the right by the Freedom of Information Act 2000 (FOIA) to request access to general information held by public sector organisations, such as the council. In line with other similar organisations the council has seen a steady rise in the number of requests received, which now stands at just over 1,000 per year. As a result a different management system is being investigated to further enhance how individuals are directed to or provided with the information they require. An internal audit of the FOIA process will take place 2015-16.

- A key element in ensuring compliance with Information Governance legislation is the training of employees. A three-year training plan covering the period 2013-16 is in place making basic Information Governance training mandatory for all employees every three years. The next council-wide basic training session will commence October 2015.
- Further expert level training packages for key employees are in the process of being created and rolled out in the following:
 - Requests for Information
 - Records Management
 - Information Security, Risk and PSN
 - Data De-identification.
 - Information Sharing and Caldicott
 - Security Classification
 - Data Quality
- Key information security messages will continue to be sent out via the weekly council wide communication function and by the Digital Newsletter. The 2014 Information Security six week campaign is being built on and this will see a further campaign during 2015-16.
- Work towards the further implementation of an Electronic Document Records Management System (EDRMS) will continue to enhance the way records are managed.
- Interest in the use of the council's Corporate Record Store by schools is being explored as part of the 'Services to Schools' project. Other Commercial interest in this facility is also being explored with some early interest.

3. OPTIONS FOR CONSIDERATION

3.1 As detailed below.

4. ANALYSIS OF OPTIONS

- 4.1 **Option 1** – The Audit Committee agrees that the current position and the recommended planned developments provide sufficient assurance in our approach to Information Governance and IT Security.
- 4.2 **Option 2** –The Audit Committee do not agree that the current position and the recommended developments do not provide sufficient assurance and requests that additional work is undertaken.

5. RESOURCE IMPLICATIONS (FINANCIAL, STAFFING, PROPERTY, IT)

5.1 IT Services will manage Information Governance and IT Security within the IT Service portfolio.

OUTCOMES OF INTEGRATED IMPACT ASSESSMENT (IF APPLICABLE)

5.2 An integrated impact assessment is not required for this report.

6. OUTCOMES OF CONSULTATION AND CONFLICTS OF INTERESTS DECLARED

6.1 There are no consultations or conflicts of interests to report.

7. RECOMMENDATIONS

7.1 The Audit Committee should consider whether the report provides sufficient assurance of the adequacy of the council's Information Governance and IT Security arrangements.

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