

NORTH LINCOLNSHIRE COUNCIL

AUDIT COMMITTEE

ANNUAL INFORMATION GOVERNANCE UPDATE

1. OBJECT AND KEY POINTS IN THIS REPORT

- 1.1 To provide the Audit Committee with an annual position statement on the council's Information Governance arrangements.
- 1.2 The key points are:
 - The council is required by law to comply with a range of information related requirements.
 - Further developments have taken place over the last 12 months to strengthen the council's approach to information governance. Details are set out in the report together with the findings from internal and external assessments.

2. BACKGROUND INFORMATION

- 2.1 An assurance report is presented to the Audit Committee each year to provide an update on the council's Information Governance arrangements and compliance.
- 2.2 The council has a legal obligation to comply with information legislation, notably the General Data Protection Regulation (GDPR)/Data Protection Act 2018, Freedom of Information Act and the Environmental Information Regulations. Collectively we refer to these requirements as "Information Governance".
- 2.3 An Information Governance Framework comprising a series of policy schedules sets out how the council will comply with legislation and good practice. Its implementation is led and overseen by the Data Protection Officer.
- 2.4 The council is committed to the ongoing strengthening of its Information Governance arrangements and continues to strive to meet the standards set by both internal audit and external assessments, with a high standard of compliance evidenced.

2.5 Key developments and assurance highlights over the last 12 months included:

- The annual Information Governance Self-Assessment, necessary for accessing health information. This would usually have been completed and accepted by the NHS by 31 March, but due to the COVID19 pandemic the submission date for 2020 is now 30 September 2020. Previous submissions have been successful and we are well positioned to for the re-submission.
- An Internal Audit review of the council's approach to compliance with the General Data Protection Regulation (GDPR) concluded in October 2019 with a "satisfactory assurance / low risk" opinion.
- The information governance framework was comprehensively reviewed and updated March 2020 to align it with changes in legislation and professional good practice.
- Mandatory training for all employees on Information Governance requirements, including GDPR is undertaken on a regular basis. A communication campaign for all employees was undertaken January 2020 as a refresher of key considerations.
- Compliance with national ICT security standards was maintained and externally certified with no serious ICT breaches occurring. Key highlights are set out below:
 - The council achieved compliance for the PSN Code of Connection in May 2020 following a successful submission without any challenge from Cabinet Office. This allows the council continued access the Public Services Network for another year.
 - Attempted email phishing attacks are becoming increasingly common nationally and more sophisticated. To raise employee awareness and assist in the detection and prevention of attacks, all employees have been enrolled onto a 12 month Cyber Security Awareness Training programme, which has received national attention. The training consists of a series of Phishing Simulations, a short 2-3 minute educational video and quiz each month.
 - The ICT Service was audited in March 2020 to measure the effectiveness of controls of i) Server Management and ii) Firewall Security. Both audits concluded with a "substantial assurance / low risk" opinion.

2.6 During the last 12 months there have been six referrals from the Information Commissioner's Office (ICO) about how the council responded to requests for information or protected personal information.

This number is lower than the previous year where there were eleven referrals, and is within the normal reporting level as seen in previous years. In addition the council self-reported two issues to the ICO. The findings were as follows:

- In one case the ICO supported the council's approach and position on the reported issues.
- In two instances the ICO issued a Decision Notice supporting the action the council had taken.
- In respect of the two self-reported issues, the ICO supported the council's approach for one case and required no further action. The second case is still being considered by the ICO and we are awaiting a response.
- As at July 2020 we are awaiting a response from the ICO on three cases.

2.7 Further continued strengthening of the council's information governance arrangements will be made over the next 12 months through an action planning based approach.

3. **OPTIONS FOR CONSIDERATION**

3.1 As set out below.

4. **ANALYSIS OF OPTIONS**

4.1 **Option 1** – The Audit Committee agrees that the current position provides sufficient assurance in our approach to Information Governance.

4.2 **Option 2** – The Audit Committee considers the current position is not sufficient and requests that additional work is undertaken.

5. **FINANCIAL AND OTHER RESOURCE IMPLICATIONS (e.g. LEGAL, HR, PROPERTY, IT, COMMUNICATIONS etc.)**

5.1 Not applicable.

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

6. **OTHER RELEVANT IMPLICATIONS (e.g. CRIME AND DISORDER, EQUALITIES, COUNCIL PLAN, ENVIRONMENTAL, RISK etc.)**

6.1 There are no other relevant implications.

7. OUTCOMES OF INTEGRATED IMPACT ASSESSMENT (IF APPLICABLE)

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

8. OUTCOMES OF CONSULTATION AND CONFLICTS OF INTERESTS DECLARED

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

9. RECOMMENDATIONS

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

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Background Papers used in the preparation of this report – None