

 Employment Committee 21 March 2018		Agenda Item No. 8
Title	Information Security & Conduct Policy	
For further information about this report please contact	Graham Leach Democratic Services Manager & Deputy Monitoring Officer 01926 456114 graham.leach@warwickdc.gov.uk	
Wards of the District directly affected	None	
Is the report private and confidential and not for publication by virtue of a paragraph of schedule 12A of the Local Government Act 1972, following the Local Government (Access to Information) (Variation) Order 2006?	No	
Date and meeting when issue was last considered and relevant minute number	N/A	
Background Papers	None	

Contrary to the policy framework:	No
Contrary to the budgetary framework:	No
Key Decision?	No
Included within the Forward Plan? (If yes include reference number)	No
Equality Impact Assessment Undertaken	No

Officer/Councillor Approval		
Officer Approval	Date	Name
Chief Executive/Deputy Chief Executive	8/3/2018	Andrew Jones
Head of Service		
CMT		
Section 151 Officer	12/3/2018	Mike Snow
Monitoring Officer	12/3/2018	Andrew Jones
Finance	8/3/2018	Jenny Clayton
Portfolio Holder(s)	12/3/2018	Andrew Mobbs
Consultation & Community Engagement		
Ty Walter – ICT Manager – 7/3/2018 Anna More – Information Governance Manager – 7/3/2018 Tracy Dolphin – HR Manager – 7/3/2018		
Final Decision?	Yes	
Suggested next steps (if not final decision please set out below)		

1. **Summary**

- 1.1 The report brings forward revisions to the current Information Security & Conduct Policy for Warwick District Council to ensure it complies with General Data Protection Regulations that come into force in May 2018.

2. **Recommendation**

- 2.1 That the Employment Committee approve the revised Warwick District Council Information & Security Conduct Policy is adopted, as set out at Appendix 2.

3. **Reasons for the Recommendation**

- 3.1 From 25 May 2018 the UK will be subject to the General Data Protection Regulations from the EU. These will replace the current Data Protection Act 1998 and will be supplemented (and in due course) replaced by the Data Protection Act 2018.
- 3.2 The Council will be required to abide by the regulations because of its need to handle personal data in order to carry out its functions as a local authority.
- 3.3 Under the regulations the Council must appoint a Data Protection Officer. The Council has completed this duty via a shared Information Governance Manger with Stratford District Council as part of a two year agreement.
- 3.4 A revised Information Governance Framework will be brought to the Executive, along with relevant polices for consideration at their meeting in April. However the Information Security & Conduct Policy, which forms part of the remit of Employment Committee.
- 3.5 The Policy has only had minor amendments to reflect the new Regulations and forthcoming Data Protection Act within the UK, as well as including further details. The amendments are summarised at Appendix 1 with the revised Policy set out at Appendix 2.

4. **Policy Framework**

4.1 **Fit for the Future (FFF)**

The Council's FFF Strategy is designed to deliver the Vision for the District of making it a Great Place to Live, Work and Visit. To that end amongst other things the FFF Strategy contains several Key projects.

The FFF Strategy has 3 strands – People, Services and Money and each has an external and internal element to it. The table below illustrates the impact of this proposal if any in relation to the Council's FFF Strategy.

FFF Strands		
People	Services	Money
External		
Health, Homes, Communities	Green, Clean, Safe	Infrastructure, Enterprise, Employment

<u>Intended outcomes:</u> Improved health for all Housing needs for all met Impressive cultural and sports activities Cohesive and active communities	<u>Intended outcomes:</u> Area has well looked after public spaces All communities have access to decent open space Improved air quality Low levels of crime and ASB	<u>Intended outcomes:</u> Dynamic and diverse local economy Vibrant town centres Improved performance/productivity of local economy Increased employment and income levels
Impacts of Proposal		
No direct impact	No direct impact	No direct impact
Internal		
Effective Staff	Maintain or Improve Services	Firm Financial Footing over the Longer Term
<u>Intended outcomes:</u> All staff are properly trained All staff have the appropriate tools All staff are engaged, empowered and supported The right people are in the right job with the right skills and right behaviours	<u>Intended outcomes:</u> Focusing on our customers' needs Continuously improve our processes Increase the digital provision of services	<u>Intended outcomes:</u> Better return/use of our assets Full Cost accounting Continued cost management Maximise income earning opportunities Seek best value for money
Impacts of Proposal		
<i>The policy intend to put in place good governance structure to ensure staff can act in accordance with the law and continue to deliver excellent service.</i>	<i>The policy provides assurance to our customers that their personal data and information is handled securely and treated with the respect that it deserves.</i>	<i>No direct impact.</i>

4.2 **Supporting Strategies** - The report does not directly relate to any of the supporting strategies.

4.3 **Changes to Existing Policies** – the report brings forward revisions to the Information Security & Conduct Policy and these will be cross referenced within the Information Governance Framework.

4.4 **Impact Assessments** – An impact assessment has not been undertaken because the report brings forward new policies in line with EU regulations and statutory requirements.

5. Budgetary Framework

5.1 The report does not impact on budget framework or the budget for the Council.

6. Risks

- 6.1 The main risk associated with the report is the non adoption of the proposed Framework and Policies because the revisions need to be in place ahead of GDPR coming into force on 25 May and time needs to be allowed to make staff aware of these.

7. Alternative Option(s) considered

- 7.1 The Employment Committee could consider approving the Information Governance Framework and policies with suitable amendments but this is not recommended because these have been developed using best practice and experience from other authorities.

Summary of the Changes made to the Information Security and Conduct Policy

Text in *italics* is an addition.

Text ~~struck through~~ is to be removed

Section 1 Management Summary

A new introductory paragraph has been added so that it reads:

This high level policy is one of a series that forms the policy core of the Information Governance (IG) Framework. The IG Framework recognises that sound information management relies on best practice from a number of different disciplines. These are privacy management, Information law and rights, information security and risk management, records management and information quality management.

Section 2 Policy Statement

The first paragraph has been revised as follows:

Warwick District Council is committed to the development and maintenance of an *Information Security and Conduct Policy*. ~~Information Security Management System (ISMS)~~. *The Information Security and Conduct Policy* ISMS will ensure that:

Two additional points added to bullet point list

- *An Information Asset Register is maintained*
- *Information security risks are regularly re-assessed*

Section 6 Responsibilities:

Two new paragraphs have been added to reference the Senior Information Risk Officer (SIRO) and Information Governance Manager. These are as follows:

"The SIRO has overall responsibility for information as a strategic asset, ensuring that the value to the organisation is understood and recognised and that measures are in place to protect against risk. The Council's SIRO is the Deputy Chief Executive & Monitoring Officer"

"The Information Governance Manager is responsible the development, implementation and maintenance of the Information Governance Framework and the coordination of all component elements that ensure compliance with information law and best practice."

Section 8 Confidentiality of Information.

The following paragraph has been amended to include reference to two new pieces of regulation

"All employees and contracted third parties working for the council must observe the utmost care and attention in dealing with personal information – in no circumstances must any information about the Council or its customers be divulged to anyone outside the organisation, without proper authority from a line manager who must ensure that such a disclosure would not contravene the Data Protection Act 1998, the General Data Protection Regulations or Data Protection Act 2018."

Section 18 Compliance, Monitoring and Assurance

An additional sentence has been added to the end of the second paragraph that it reads:

More details on the use of monitoring information is given in the Monitoring Policy

Section 19 Policy Compliance

This has been amended to correctly reference the procedure for handling complaints about the conduct of Councillors in respect of this Policy.

For Members, references in this policy to disciplinary action will be considered under *the Arrangements for dealing with complaints about Councillors* ~~mean referral to the Standards Committee~~ and this document will be treated as a local protocol for this purpose

Section 20 – Policy Governance

The accountable for the Policy has been update to be the Deputy Chief Executive & Monitoring Officer.

Section 22 – References

Three additional regulation/legislative frameworks have been added as follows:

- *The Privacy and Electronic Communications (EC Directive) Regulations 2003*
- *General Data Protection Regulations*
- *(following Royal assent) The Data Protection Act 2018*