

 Executive 12 February 2020		Agenda Item No. 8
Title	Information Governance Framework	
For further information about this report please contact	Shafim Kauser Information Governance Manager 01926 456136 Shafim.kauser@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Is the report private and confidential and not for publication by virtue of a paragraph of schedule 12A of the Local Government Act 1972, following the Local Government (Access to Information) (Variation) Order 2006?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	5 April 2018	
Background Papers	General Data Protection Regulation, Data Protection Act 2018	

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		Andrew Jones
Head of Service		Graham Leach
CMT		Andrew Jones
Section 151 Officer		Mike Snow
Monitoring Officer		Andrew Jones
Finance		Andrew Rollins
Portfolio Holder(s)		Andrew Day
Consultation & Community Engagement		
All Heads of Service –		
Final Decision?		Yes
Suggested next steps (if not final decision please set out below)		

1. **Summary**

- 1.1 This report proposes updates to the Information Governance Framework, associated policies and documents adopted by Warwick District Council on 5 April 2018 in preparation for the General Data Protection Regulation (GDPR).
- 1.2 This follows a review that considered the introduction of Data Protection Act 2018 (DPA) and follows best practice and guidance issued by the information Commissioner's Office.

2. **Recommendation**

- 2.1 That the Executive approves the Warwick District Council, revised Information Governance Framework (Appendix 1).
- 2.2 That the Executive approves the following policies, as set out in the appendices to the report:
 - (a) Data Protection & Privacy (Appendix 2)
 - (b) Information Access and Rights (Appendix 3)
 - (c) Information Security & Conduct (Appendix 4)
 - (d) Information Security Incident Management (Appendix 5)
- 2.4 That the Executive revises Delegation G (13) to read as follows: Make decisions under the provisions of the General Data Protection Regulation and Data Protection Act 2018.; so that it removes reference to the Data Protection Act 1998 and asks Council to amend the Constitution to reflect this.

3. **Reasons for the Recommendation**

- 3.1 The review updates the Framework and documents to reflect best practice guidance.
- 3.2 A summary of the changes is set out below:
 - a) Information Governance Framework – changes to Appendix 1 to reflect current policies and procedures
 - b) Data Protection & Privacy Policy – update to make reference to the Data Protection Act 2018 and minor changes to reflect best practice
 - c) Information Access and Rights Policy – Update to make reference to Environmental Information Regulation 2004 (EIR) and provide additional information about policy requirements
 - d) Information Security & Conduct Policy – changes to Appendix 1 to reflect current policies and minor changes to clarify system owner and data confidentiality
 - e) Information Security Incidents Management Policy – Clarify process for reporting, handling and investigating breaches of security and personal data breach
- 3.5 Overall, as part of the review, the review period for all Policies has been amended to every 23 months or more frequently where necessary. This will allow for an early review if required but otherwise allows the policies to remain in force for a reasonable period.

- 3.6 The Framework and associated policies are based on good practice issued by the Information Commissioner’s Office and shared knowledge through partnership but also reflect the requirements placed on the Council by GDPR and DPA.
- 3.7 The proposed amendments to the scheme of delegation are proposed to reflect the changes in statute and regulation to enable current working practices to continue.

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	<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

behaviours		
Impacts of Proposal		
<i>The framework and polices 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 framework and policies provide 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 does not propose any amendments to Existing Policies

4.4 **Impact Assessments** – An impact assessment has not been undertaken because the report updates existing 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 for the Council.

6. Risks

6.1 The main risk associated with the report is the non adoption of the proposed Framework and Policies as this may result in the Council failing to implement best practice and changes in legislation.

7. Alternative Option(s) considered

7.1 The Executive 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.