



Classification	Official		
Meeting	ECFRS Performance & Resources Board	Agenda no.	16
Meeting Date	20th May 2024		
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Subject	Information Governance- update		
Type of Report	Information		
PFCC Action Point No.	N/A	For Publication	Yes

RECOMMENDATION(S)

Members of the board are asked to note the update on the Information Governance Action plan for 2024/2025.

EXECUTIVE SUMMARY

The Information Governance Action plan for this financial year includes all actions and recommendations received from previous Data Protection Audits (internal and external). The action plan also includes National Fire Standards requirements, Information Commissioner Officer (ICO) recommendations, MS Partner (Silversands) recommendations, and Audit Committee actions. Compiling all the actions in one plan is to monitor compliance and ensure we are completing all the required steps to achieve good compliance and be able to report to different boards the progress made on their recommendations. The appended action plan is provided as an update and overview of the work to date against that plan.

BACKGROUND

In collaboration with business areas and the IGB, 14 of the 56 actions have been completed and closed, 12 are ongoing to be completed between the end of summer and December 2024, and 30 are to be confirmed following the approval of the work on the Electronic Storage Remediation Project.

The Information Governance action plan focuses on three main areas of data protection compliance and the following have been achieved so far:

1. Record Management:

- The IGB has approved the records management policy version 2, which will be consulted with Rep bodies in July.
- The Information Governance team have finished a booklet based on the framework to guide staff and inform them of the policies and procedures.
- A new resource (started in the last week of April) to focus on records management and reviewing the retention schedule with the business areas. The resource is also progressing on updating the Information Asset Register, Records of Processing Activity (RoPA), and dataflows that document how the authority processes personal data and special data categories.
- IAO's roles and responsibilities document has been approved by the IGB as required by the National Fire Standards. The document will be consulted with SLT and Rep bodies in July 2024.
- Electronic Storage Remediation Project: The IGB agreed to the request for external assessment regarding the management of records in SharePoint sites and the use of electronic storage. DPO and DDPO, with two members of ICT, started to work on a 10-week project with Silversands, our Microsoft partners. To address the areas of concern, Silversands have developed a recommendations report to conduct all the technical checks and provide us with solutions for implementation. After receiving the Report, SIRO DPO and DDPO have been meeting to establish an action plan and organise a working group to ensure the recommendations are followed in the next 12-18 months. The appended slides provide an overview of the phases of the project.

2. Risk and assurance:

- SLT and Rep bodies have approved the Surveillance and Fob policies.
- Various aspects of the risk register, including processes, actions, and risks, have been reviewed and improved to ensure clear control measures are in place. The appended Action Plan shows the main risks and progress against risk register control measures.
- Information Sharing Protocols/Agreements (ISPs) are now published on the website to demonstrate transparency on how the Authority shares information with Essex partners and the purposes of the agreements. [Privacy Notice | Essex County Fire and Rescue Service \(essex-fire.gov.uk\)](#)

3. Training and awareness

- The Data Protection Impact Assessment (DPIAs) process has been improved, and staff are now more aware of the importance of completing the assessment every time they start an activity or project that involves processing personal data or special data categories.
- The IG landing page helps staff members understand what the IG department does and general definitions, such as personal data and special data categories.
- The IG communication plan has been completed, but new actions will need to be added once the IGB agrees to the project with Silversands.
- In February 2024, 72% of ECFRS staff and volunteers had completed the Data Protection mandatory module. According to L&D, around 50 people are currently unable to complete the module due to long-term illness, maternity leave, or having recently joined the service. This is approximately 3% of the workforce. Some people need to renew their learning after 12 months. However, it is part of

the plan to update the module and include some training on using electronic storage.

What is remaining?

SIRO DPO and DDPO have established specific goals and milestones to enhance Information Governance across ECFRS. However, Records Management procedures need to be carefully considered and are the primary focus. We have received guidance on how to improve this area from Silversands, which is a positive step towards implementing mitigation actions. This will facilitate improved data management, enable informed data storage decisions, and prevent data breaches.

OPTIONS AND ANALYSIS

The implementation of the action plan is currently underway, and SIRO, DPO and DDPO have agreed to include all the recommendations into the action plan for 2024/2025, to achieve good assurance while reducing organisational risk.

RISKS AND MITIGATIONS

There are significant risks associated with the management of records and the storage of electronic records. Managing data is difficult due to the large number of SharePoint sites. As a result of data breaches reported over the past year related to SharePoint, the DPO, SIRO, and DPO developed an Electronic Storage Remediation project. The project has established deadlines and is designed to address areas of concern and will be consulted at the next IGB.

LINKS TO FIRE AND RESCUE PLAN

- Digital & Data Strategy
- Infrastructure and Security (Annual Plan)
- Data Quality (Annual Plan)
- Data Management Fire Standard
- Records Management Policy
- Data Protection Policy

FINANCIAL IMPLICATIONS

ICO fines, claims for compensation.

LEGAL IMPLICATIONS

1. Personal data is not controlled, retained or destroyed in line with data protection law or the S46 records management code of practice. Records are stored across multiple storage areas, leading to duplication, inaccuracies and an inability to respond to statutory requests for information within legal timeframes. This may cause the Authority reputational damage, regulatory censure, increased workload, and damage the trust of staff, the public, and suppliers. **Action:** Specific actions have been added to the action plan to ensure compliance with ICO recommendations, however, this risk remains the main concern for ECFRS.
2. Staff who manage information on behalf of the Authority (including volunteers) unknowingly breach data protection policies and guidance due to lack of

awareness, communication and training. This can result in regulatory action or fines by the ICO, potential harm to individuals and claims for compensation. **Action:** The risk has been partially mitigated. A module called “*Data Protection Essentials*” has been published on the Service-learning platform in May 2022. Further work is required on role based training and regular communications.

STAFFING IMPLICATIONS

Subject to consultation with IGB on Electronic Storage Remediation Project.

EQUALITY AND DIVERSITY IMPLICATIONS

The actions being taken will not have a disproportionate impact on individuals with protected characteristics (as defined within the Equality Act 2010), when compared to all other individuals and will not disadvantage people with protected characteristics.

Race	n	Religion or belief	n
Sex	n	Gender reassignment	n
Age	n	Pregnancy & maternity	n
Disability	n	Marriage and Civil Partnership	n
Sexual orientation	n		

The Core Code of Ethics Fire Standard has been fully considered and incorporated into the proposals outlined in this paper.

HEALTH AND SAFETY IMPLICATIONS

N/A.

CONSULTATION AND ENGAGEMENT

To include rep bodies, boards, external agencies

FUTURE PLANS

Long term strategic direction

LIST OF BACKGROUND PAPERS AND APPENDICES

Appendix 1: Information Governance Action Plan 2024/2025

Appendix 2: IGB & Information Governance Action Plan.

