



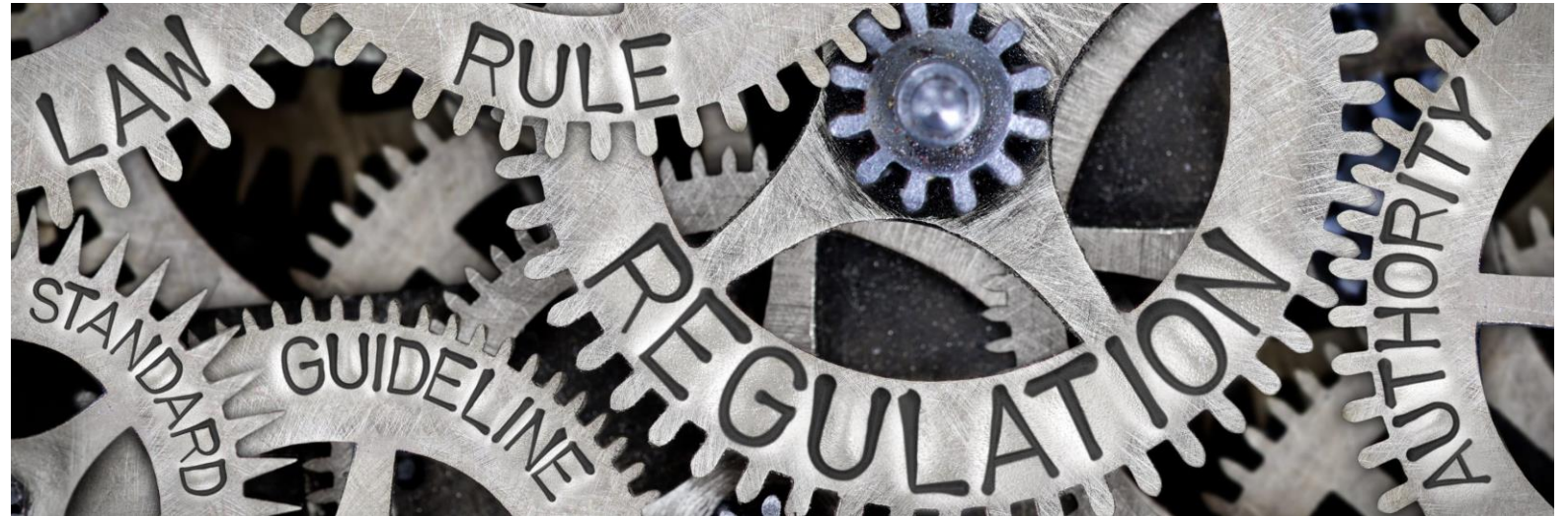
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# ECFRS Information Governance Quarterly Report

*September 2024*

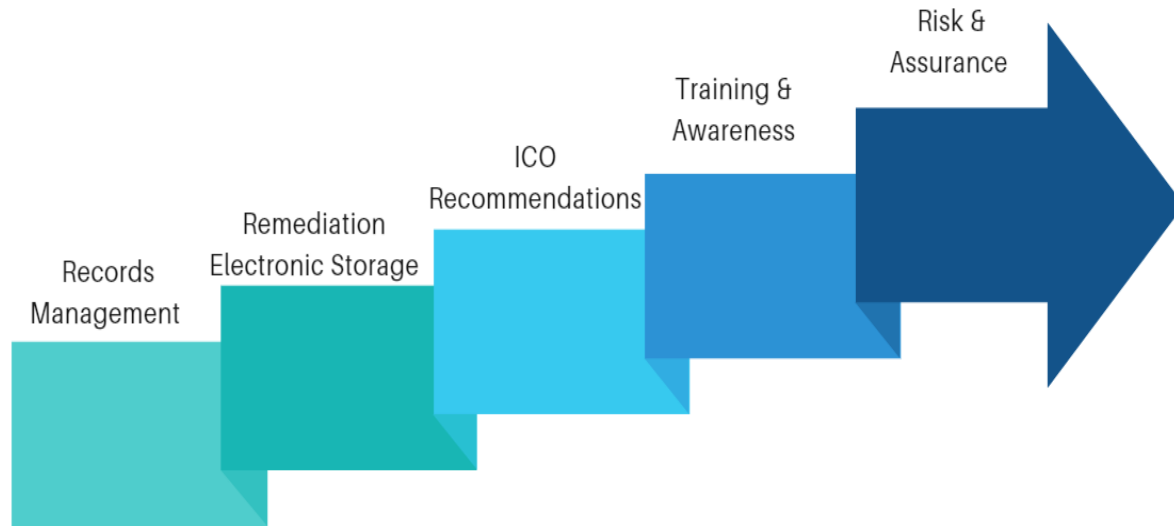
*Karl Edwards*

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# Information Governance Action Plan



Area of Compliance	Number of Actions	Ongoing	Completed	Subject to remediation Plan
Records Management	28	10	7	11
Risk & Assurance	15	2	6	7
Training & Awareness	12	3	3	6

The Information Governance action plan encompasses three key areas of compliance: Records Management, Risk & Assurance, and Training & Awareness. These areas address issues highlighted in the past four Data Protection audits. Additionally, the plan incorporates recommendations related to Data Fire Standards, ICO guidance, and a remediation plan for electronic storage.



# Records Management

Information Asset Register (IAR) and Records of Processing Activity (RoPA):

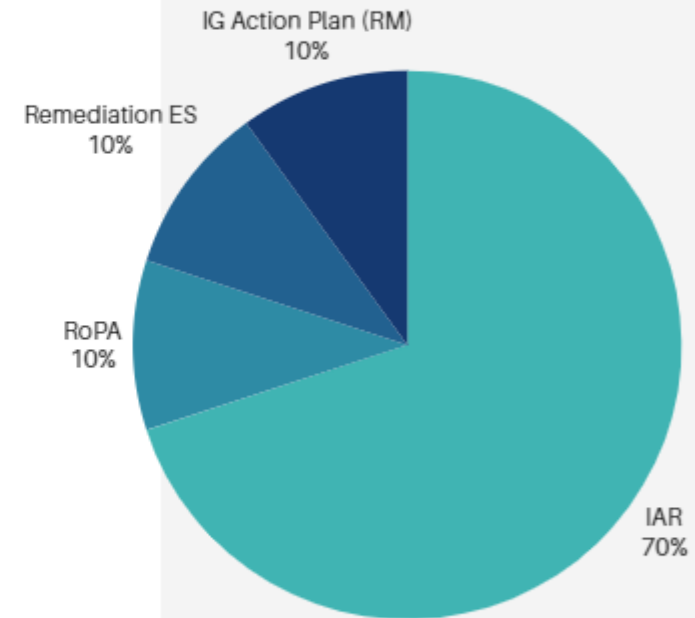
**Progress:** Jasmine Blows has been reviewed the IAR with various business areas to update current assets and retention schedules. As of August 28, 90% of business areas have completed their updates.

## Next Steps:

- Emphasize the importance of maintaining an updated register by distributing a form to the respective owners.
- Conduct meetings to accurately reflect Data Flows, ensuring proper data management and information categorization in each area.
- Post-revision, the updated data will be used to revise the retention schedule.

## Remediation Plan on Electronic storage:

- Report have been provided by Silversands with a number of recommendations to improve areas of concern and have been reviewed with ICT as it requires technical implementations in O365.
- A O365 Management group have been formed by ICT and IG will meet review the recommendations on report and follow an action plan to complete the actions and make progress.
- IG Officer (JB) has started the review on department breakdowns on SharePoint sites whils waiting for admin viewing access from ICT.





## Training & Awareness:

## Risk & Assurance:

**Progress:** The Information Governance Manager is working on updating the Data Protection Module to include the current approved policies, such as the records management policy and the data protection policy. The module will include a tick box option to provide staff with the opportunity to read the policies, understand them, and accept that they have read them.

**Progress:** The Information Governance Manager has updated the nondisclosure agreements template, which will be reviewed with HR. The IG team will start to establish specific days to check for desk sweeps.

The intranet IG Landing page has been updated to provide guidance to staff, and more policies and procedures will be added once approved.

### **Next Steps:**

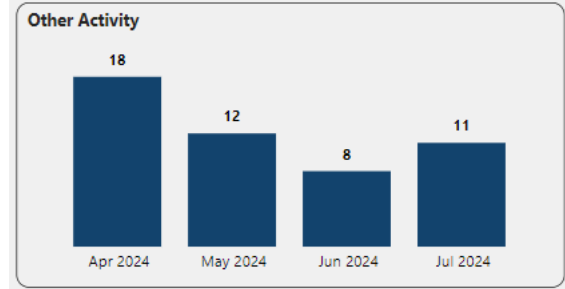
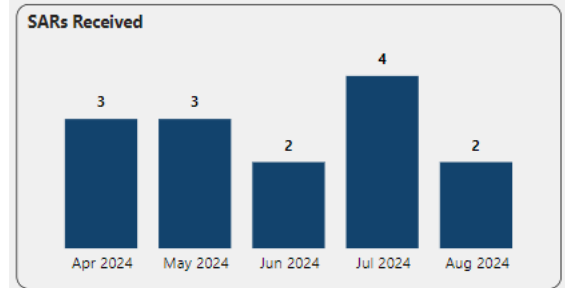
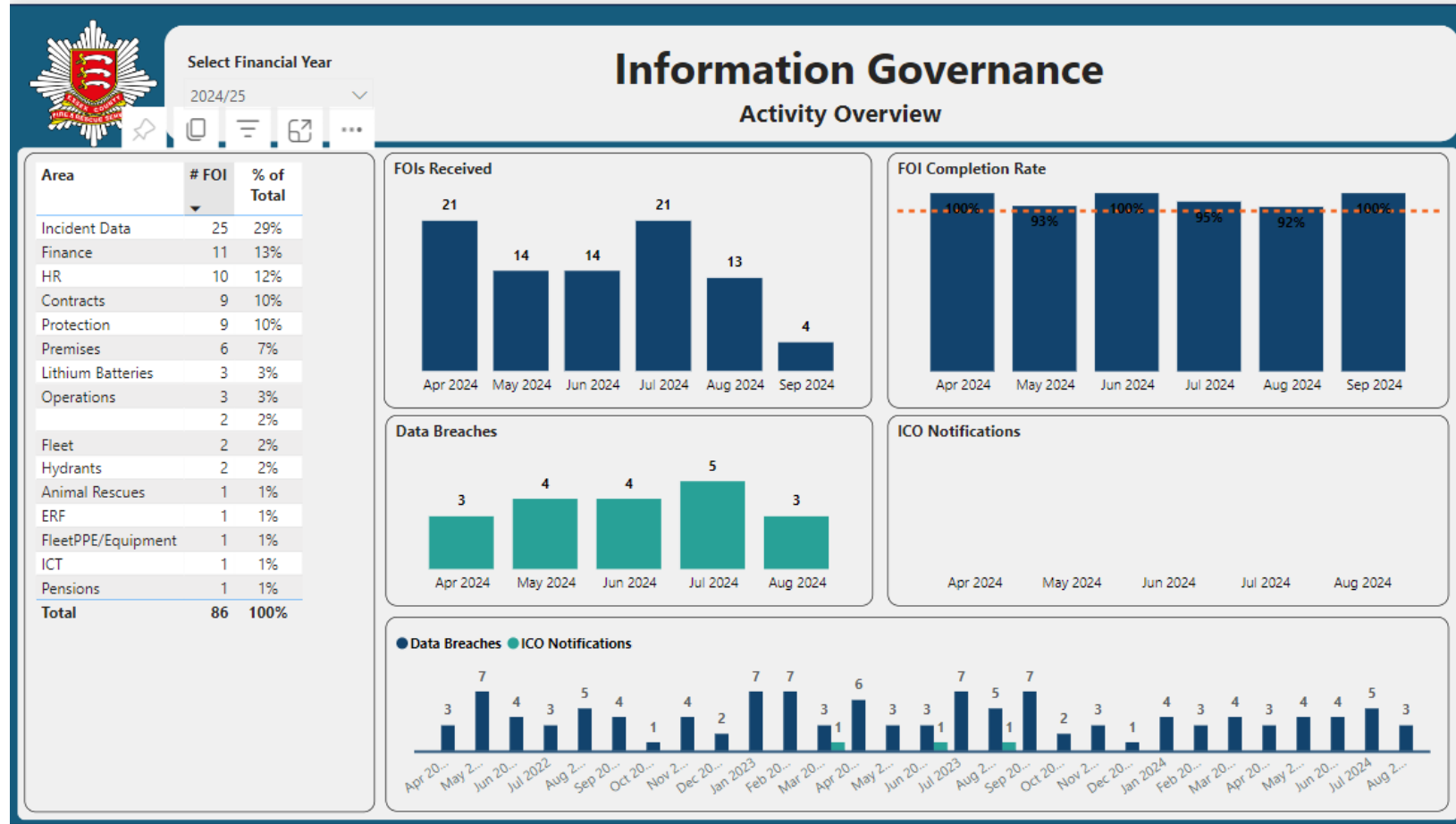
Remediation Plan on Electronic Storage: Establish Data security measures, regularly monitor access, establish clear procedures to describe different kinds of data, data sharing policies.

### **Next Steps:**

- A regular communications plan is under review to ensure that staff are kept up to date and regularly reminded of the important role they play in protecting personal data and enabling the Authority to operate effectively and in compliance with the law.
- Induction day for all started should include a data protection presentation module and introduction.
- Remediation Plan on Electronic Storage: Training on using technology should be implemented. The acceptable use policy will be reviewed, and conversations will be held to ensure that the policy includes guidelines on how to use O365 tools, roles, responsibilities, and security measures.



# Compliance levels





# Information Governance Team

The Information Governance Team is responsible for ensuring that all aspects of Information Governance are implemented throughout the organisation. In doing so, it reflects the wider legal framework imposed on public sector information through legislation such as:

- Freedom of Information Act (2000) (FOI).
- Environmental Information Regulations (2004) (EIR).
- Data Protection Act (2018) (DPA) UK General Data Protection Regulations.
- Investigatory Powers Act (2016).
- Requirements for respect for private life and freedom of expression under the Human Rights Act (1998) (HRA).

**SIRO**  
Karl Edwards  
Director Corporate Services

**Information Governance  
Manager & DDPO**  
Ana Tuckwell

**Information Governance Officer**  
EIRs, FOIs & SARs & IG Requests  
Maggie Ward

**IG & Complaints Officer**  
Fire Reports & IG Requests, Compliments & Complaints  
Rebecca Wenborn

**Information Governance Officer**  
Records Management  
Jasmine Blows

## Updates:

**1. IGS Contract:** The contract with IGS (DPO Services) concluded on 31st August.

**2. Subject Access Requests:** SAR redaction services were previously outsourced to IGS, but this function will now be handled in house. The Information Governance team has conducted two training sessions with IGS to ensure a smooth transition. These sessions covered the rules and guidelines necessary to manage SARs in compliance with Data Protection laws. Maggie Ward, our Information Governance Officer (IGO), will lead SAR redaction, with support from the IG Manager and other IGOs for more complex cases.

**3. New Redaction Tool:** The Service has obtained a powerful SAR redaction tool called Nalytics. This tool uses AI technology to help redact SARs and format them correctly to ensure compliance.