

## Progress in delivering IG Action Plan (2019/20) to Q3 (December 2019)

Ref:	Action	Deadline	Status	Comments, Progress & Result Update
1.1	<b>Governance - Revise NCC Information Strategy</b> to align with the delivery of the Council Plan (2017 – 2021).  Subject to confirmation of fit with Business Intelligence Strategy & Enhancing Customer Experience by Digital Development Programme.	June 19	Deferred	As explained to Committee in November 2019, deferred to take account of / align with the Improving Customer Experience through Digital Development Programme.
1.2	<b>Governance - Review key policies</b> in line with organisational learning, enforcement action, case law and good practice.	June 19	Complete	Review complete, sign-off by Monitoring Officer under delegated authority from Policy Committee.
1.3	<b>Audit and Quality assurance</b>			
1.3.1	Design and populate a single register of information systems used by NCC*	July 19	Complete	Apps Catalogue expanded to include IG information.
1.3.2	Design and implement 2019/20 data security and protection spot check inspection programme*	July 19	Complete	Methodology agreed by IGB Sept 19. First spot check completed.
1.4	<b>Training &amp; Awareness</b>			
1.4.1	Data Security and Protection training needs analysis & training plan*	June 2019	Complete	Approved by IGB June 19.
1.4.2	Design and deliver induction training on information governance	July 19	Revised Approach Complete	Standard training to continue to be done at induction supported by fuller, up-to-date IG information on intranet.
1.4.3	Design and release initial One Minute Guide (short guides making policies and procedures more accessible for staff).	July 19	Complete	OMG on information rights issued and posted on new IG intranet hub.
1.5	<b>Governance, Audit and Quality assurance</b>			
1.5.1	Complete and validate register of Surveillance Cameras / CCTV systems	April 2019	Complete	Register designed and populated.

1.5.2	Undertake an exercise with Information Asset Owners / Managers (IAOs/IAMs) to validate the Council's Information Asset Register	June 19	Complete	Validation questionnaire released in July. Current position is known. Designing training for IAOs/IAMs to help them meet role requirements.
<b>2.1</b>	<b>Governance, Audit and Quality assurance</b>			
2.1.1	Data Protection by Design and Default Procedure (to include pseudonymisation requirements) to be developed and approved*	Sept 2019	Complete	Subject to IGB Sub-Group approval.
2.1.2	Design methodology pseudonymisation / anonymization / de-identification controls audit and undertake audit*	Sept 2019	Complete	Subject to IGB Sub-Group approval.
2.1.3	Data Quality Procedure to be developed and approved. Data quality audit(s) undertaken*	Sept 19	Complete	Subject to IGB Sub-Group approval.
2.2	<b>Training</b> - design and deliver Surveillance Cameras / CCTV training for systems owners.	Sept 19	Complete	Materials drafted. Training held Sept / Oct 2019.
2.3	<b>Performance</b> – design Information Governance performance dashboard	Sept 19	Complete	Released to IGB Aug 19.
2.4	<b>Compliance</b> – to design more proactive means for imparting privacy information to individuals	July 2019	Complete	Short form privacy notice issued and adopted.
3.1	<b>External Standards</b> - gather evidence and submit response to the Surveillance Camera Commissioner (SCC) survey of local authorities on CCTV use and protection of privacy.	Oct 2019 [Est]	Delayed by SCC, expected Q4	Significant compliance improvements in this area will make the Commissioner's Survey easier to respond to.
3.2	<b>Training and awareness</b> – participate in Health & Safety Week 2018 to raise the profile and importance of data security and protection.	Oct 2019	Complete	International Data Protection Day (28 January) marked instead. Release of new IG intranet and staff survey.
3.3	<b>Suppliers</b> – review arrangements for assuring the data protection compliance of NCC suppliers	Dec 2019	Complete	Process reviewed and amended to make incremental improvements.
3.4	<b>Performance</b> – determine metrics and method for reporting information governance performance to Committee (with a view to commencing reporting from January 2020)	Oct 2019	Partially complete	Exploring whether there is a self-assessment framework for IG which could complement the NAO Cyber Security benchmark updates received periodically by Committee.

4.1	<b>Training &amp; Awareness</b> - Design and deliver a staff survey (akin the National NHS Data Security Awareness training survey) to establish views on NCC approach to data security and protection.	Feb 2020	Complete	Survey issued 28/1/2020. Analysis will be reported to IGB in March.
4.2.1	Secure Public Services Network (PSN) IA Certification	Mar 2020	Partially complete	Work underway to build evidence portfolio.
4.2.2	Gather evidence and submit response to the Data Security and Protection Toolkit 2020/21	Mar 2020	Partially complete	

\* Required as part of the DSP Toolkit Action Plan agreed by NHS England.