

## Information Governance Action Plan 2019 - 20

To be approved by:	<b>IG Board (IGB)</b>	Date:	<b>25 March 2019</b>	Review dates:	<b>October 2019 January 2020</b>
	<b>Governance &amp; Ethics Committee</b>		<b>1 May 2019</b>		

Key: IGT = Information Governance Team; PIP = Policy, Intelligence and Performance Team; WPOD = Workforce Planning and Organisational Development Team; ICT = Information and Communications Technology Service; SIRO = Senior Risk Information Officer (role fulfilled by the Service Director for Customers, Governance and Employees)

### Quarter One: April – June 2019

Ref:	Action	Lead	Timescale (to be completed)	Risk Priority	Comments, Progress & Result Update	Link
1.1	<b>Governance - Revise NCC Information Strategy</b> to align with the delivery of the Council Plan (2017 – 2021) and focus on Info. Governance.  Subject to confirmation of fit with Business Intelligence Strategy & Enhancing Customer Experience by Digital Development Programme.	IG Team / PIP Team	June 2019	Medium	Current Information Strategy 2014-18 in line with, now superseded, Strategic Plan.	Business Intelligence Strategy
1.2	<b>Governance - Review key policies</b> in line with organisational learning, enforcement action, case law and good practice. <ul style="list-style-type: none"> <li>Information Governance Framework</li> <li>Information Rights Policy</li> <li>Information Compliance Policy</li> <li>Information Security Policy</li> </ul>	IG Team / ICT	June 2019	Medium	Ensures key policies updated in light on information strategy and to take account of development in the year since GDPR enforcement.	

<b>1.3</b>	<b>Audit and Quality assurance</b>					
1.3.1	Design and populate a single register of information systems used by NCC to serve information security and data protection compliance & standards requirements.	IG Team / ICT	May 2019 (design) Sept 2019 (complete)	High	Requirement of the Data Security and Protection Toolkit	
1.3.2	Design and implement 2019/20 data security and protection spot check inspection programme.	IG Team / ICT	June 2019 (design) July 2019 onwards (implementation)	High	Requirement of the Data Security and Protection Toolkit	
<b>1.4</b>	<b>Training &amp; Awareness</b>					
1.4.1	Data Security and Protection training needs analysis and accompanying training plan to be drafted and approved by IGB.	IG Team / WPOD	June 2019	High	Requirement of the Data Security and Protection Toolkit	
1.4.2	Design and deliver induction training on information governance to augment mandatory (cyber security orientated) elearning.	IG Team / WPOD	June 2019 (design) July 2019 onwards (delivery)	Medium	Supports GDPR requirement for appropriate organisational measures to be in place.	NCC Workforce Strategy
1.4.3	Design and release initial One Minute Guide. The first of a suite of short guides making policies and procedures more accessible for staff.	IG Team / Corp. Comms	June 2019	Medium		
<b>1.5</b>	<b>Governance, Audit and Quality assurance</b>					
1.5.1	Complete and validate register of Surveillance Cameras / CCTV systems	IG Team	April 2019	High	Required by Codes of Practice.	
1.5.2	Undertake an exercise with Information Asset Owners / Managers to validate the Council's Information Asset Register	IG Team	June 2019	High	Requirement of the Data Security and Protection Toolkit	

## Quarter Two: July - September 2019

Ref:	Action	Lead	Timescale (to be completed)	Risk Priority	Comments, Progress & Result Update	Link
2.1	<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 by IGB	IG Team / PIP Team	Sept 2019	High		
2.1.2	Design methodology for undertaking pseudonymisation / anonymization / de-identification controls audit and undertake audit	IG Team / PIP Team	July 2019 (design) Sept 2019 (audit(s) complete & reported)	High	Requirement of the Data Security and Protection Toolkit	Intelligence Led Performance Programme (CEXs Departmental Strategy)
2.1.3	Data Quality Procedure (to include to include provision for more systematic / timetabled data quality audits) to be developed and approved by IGB. Data quality audit(s) undertaken.	IG Team / PIP Team	July 2019 (design) Sept 2019 (audit(s) implemented)	High		
2.2	<b>Training</b> - design and deliver Surveillance Cameras / CCTV training for systems owners.	IG Team / WPOD	July 2019 (design) Sept 2019 (delivery)	High	Required by Codes of Practice and NCC Surveillance Camera / CCTV Procedure	NCC Workforce Strategy
2.3	<b>Performance</b> – design Information Governance performance dashboard for reporting to IGB and Risk, Safety and Emergency Management Groups,	IG Team	July 2019 (design) for use from Sept 2019	Medium		

2.4	<b>Compliance</b> – to design more proactive means for imparting privacy information to individuals	IG Team	July 2019	High	In line with NCC Privacy Notice Procedure.	
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Quarter Three: October - December 2019						
Ref:	Action	Lead	Timescale (to be completed)	Risk Priority	Comments, Progress & Result Update	Link
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.	Data Protection Officer	October 2019 (estimated)	High	SCC seeking assurance that local authorities comply with Protection of Freedoms Act and CCTV Codes of Practice.	
3.2	<b>Training and awareness</b> – participate in Health & Safety Week 2018 to raise the profile and importance of data security and protection.	IG Team / H&S Team	October 2019	Medium	Ties data protection and security to other aspects of health and safety.	
3.3	<b>Suppliers</b> – review arrangements for assuring the data protection compliance of NCC suppliers	IG Team / Procurement	December 2019	Medium	Recommended by the Data Security and Protection Toolkit	

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)	SIRO	October 2019	Medium		
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Quarter Four: January - March 2020						
Ref:	Action	Lead	Timescale (to be completed)	Risk Priority	Comments, Progress & Result Update	Link
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.	IG Team / ICT / WPOD	Jan 2020 (design) Feb 2020 (delivered)	Medium	Recommended by the Data Security and Protection Toolkit	NCC Workforce Strategy
4.2	<b>External Standards</b>					
4.2.1	Secure Public Services Network (PSN) IA certification	ICT	March 2020	High	Required for local authorities that are receiving services and data from NHS Digital and/or are involved in data sharing across health and care.	Integration with Health
4.2.2	Gather evidence and submit response to the Data Security and Protection Toolkit 2020/21	IG Team	March 2020			