Nottinghamshire County Council

REPORT OF THE SERVICE DIRECTOR FOR CUSTOMERS, EMPLOYEES AND GOVERNANCE

INFORMATION GOVERNANCE ACTION PLAN 2019/20

Purpose of the Report

1. To consider and approve the Information Governance Action Plan for 2019/20.

Information

2. The first phase of the Information Governance Improvement Programme (IGIP) focused upon compliance with the General Data Protection Regulation (GDPR) which came into force in May 2018.

3. In December 2018. Governance and Ethics Committee was advised that phase one of IGIP was at an end, with residual tasks being taken forward by the newly created Information Governance Team, working in conjunction with other business areas.

4. That meeting agreed a recommendation that an annual Information Governance Action Plan be approved by the Information Governance Board and Committee. This would emulate Personnel Committee's oversight of the annual Health and Safety Action Plan and maintain a momentum around information governance compliance work that had begun with the Information Governance Improvement Programme.

5. The first annual Information Governance Action Plan can be found at Appendix A. It draws upon requirements for general consolidation and improvement of information governance. It also includes actions required to address a limited number of gaps in meeting the standards set out in the national Data Security and Protection (DSP) Toolkit.

6. Previously known as the Information Governance Toolkit, the DSP Toolkit is a published self-assessment which provides assurance that health and social care organisations are practicing good data security and that personal information is handled correctly. Local authorities are required to comply with the requirements of the Toolkit where they provide adult social care or public health and other services that are receiving services and data from NHS Digital and/or are involved in data sharing across health and care. Circa 24,000 organisations participated in the Toolkit during 2018/19.

7. The Action Plan outlines developmental work to be undertaken by the Information Governance Team in some instances working jointly with other business areas such as ICT on information security processes; the Performance, Intelligence and Policy Team on data

quality and data minimisation techniques (e.g. anonymisation and pseudonimisation) and the Workforce Planning and Organisational Development Team on cultural awareness and improvement.

8. The Information Governance Team will continue to undertake core business alongside the implementation of the Action Plan such as:

- Providing advice and support to the departments on data protection and information governance through a business partnering approach;
- Supporting the completion of Data Protection Impact Assessments (DPIAs) which are mandatory for projects and initiatives which present a high risk to individuals' rights or freedoms.
- Coordinating the Council's management of personal data breaches.

9. Progress in delivering the second phase of the Information Governance Improvement Programme, which is focussed upon document management, will be reported separately to Committee.

Other Options Considered

10. An alternative approach would have been for developmental work on this agenda to not be reported to Committee. However, it is considered that the approach taken will enable the Committee to have oversight of Information Governance work, at least during the initial years following the major change in data protection law.

Reason/s for Recommendation/s

11. The Action Plan contains those actions that will improve the Council's compliance and performance on information governance and enable it to meet external standards for data security and protection as set out in the DSP Toolkit.

Statutory and Policy Implications

12. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

RECOMMENDATION/S

1) It is recommended that Governance and Ethics Committee:

a. Approve the Information Governance Action Plan for 2019/20 at Appendix A of this report.
b. Receive quarterly update reports on the delivery of the Action Plan.

Marjorie Toward
Service Director for Customers, Employees and Governance

For any enquiries about this report please contact: Caroline Agnew (ext. 73760)

Constitutional Comments ([SEB 04/04/2019])

1. Governance and Ethics Committee is the appropriate body to consider the content of this report.

Financial Comments ([SES 03/04/2019])

2. There are no specific financial implications arising directly from this report.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

- None.

Electoral Division(s) and Member(s) Affected

- All.