
INFORMATION GOVERNANCE QUARTERLY UPDATE

To
Audit and Governance Committee

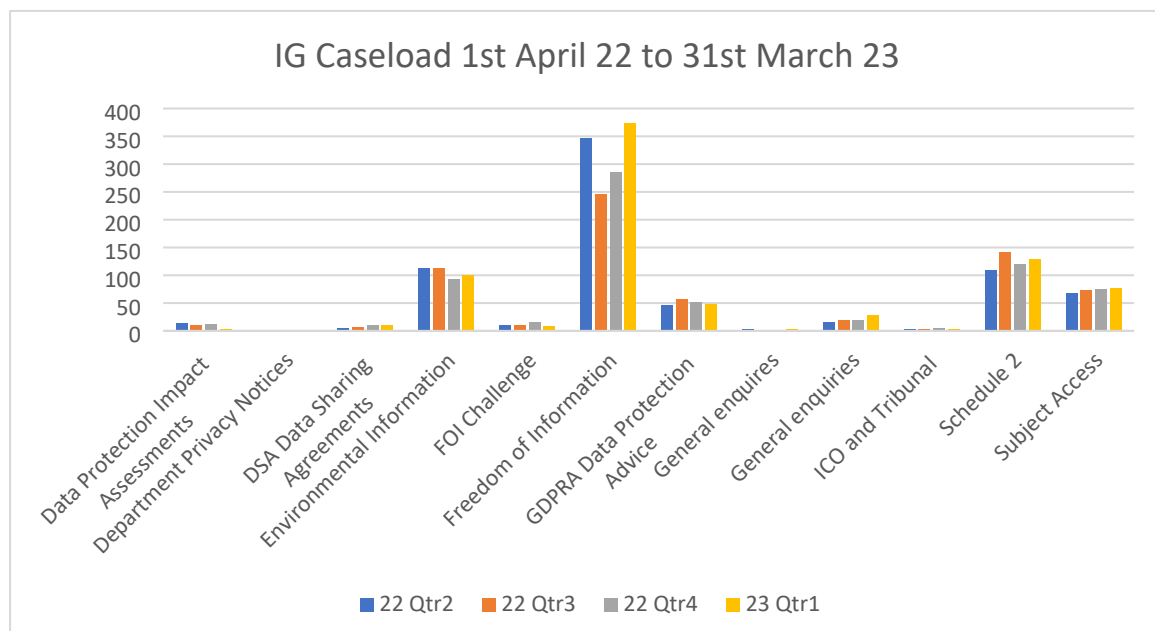
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Report author: Bellinda Cotton, Data Protection Officer, Information Governance

1. SUMMARY

This report provides Audit Committee with a summary of the main areas of work carried out by the Requests (FOI/EIR & Transparency), Data Governance and new Records Management Teams.

2. INFORMATION GOVERNANCE UPDATE



The requests team (FOI and EIR) provide a central resource to ensure all access to information requests are processed in accordance with the relevant legislation, in the same way and with consistent application of exemptions, exceptions and redactions. The team also provide a route to review for any challenged responses and manage the appeal process with the Information Commissioners Office (ICO) / Tribunal service.

The IG team is experiencing significant request and case number increases which are beginning to draw capacity away from compliance and governance work. The team will be restructuring over the summer and early autumn to look at how best to ensure capacity exists within the team to deliver its key priority of excellent corporate information and records governance and data compliance.

The service will also soon benefit from the implementation of its long-anticipated cloud-based case management system (Cyc3). This will enable the provision of far more detailed monitoring reports, enhanced remote working and updated workflow.

2.1 Requests for Information

During the last year we have seen a small increase in requests numbers, however the number of requests disguises a significant increase in the number of questions and complexity of them. The result of this means the team spends a lot more time reviewing and redacting documents to meet the statutory response deadline of 20 working days. A significant team pressure is the EIR requests that relate to property searches (CON29 requests) from organisations and can be for up to 20 properties. Though we don't keep separate reportable records on the number of properties it exceeds 2,500 per annum and is growing each year.

In addition, work pressures in service areas mean that a disproportionate time is spent chasing up service areas for the requested information so that it can be assessed and prepared for public disclosure. This is particularly important as we are required to meet the statutory 20-day period.

Request totals

| | FOI Requests | EIR Requests | Subject Access Requests |
|---|--------------|--------------|-------------------------|
| Number of requests received in Q4 22/23 | 374 (337) | 99 (102) | 77 (55) |
| Request reviews (challenges to original response) | 8 (7) | | |
| ICO appeals | 2 (3) | | |
| Annual totals | | | |
| Requests | 1252 (1221) | 418 (395) | 293 (348*) |
| Reviews | 41 (32) | | |
| ICO | 10 (9) | | |

The same quarter totals from the previous year (21/22) are in brackets.

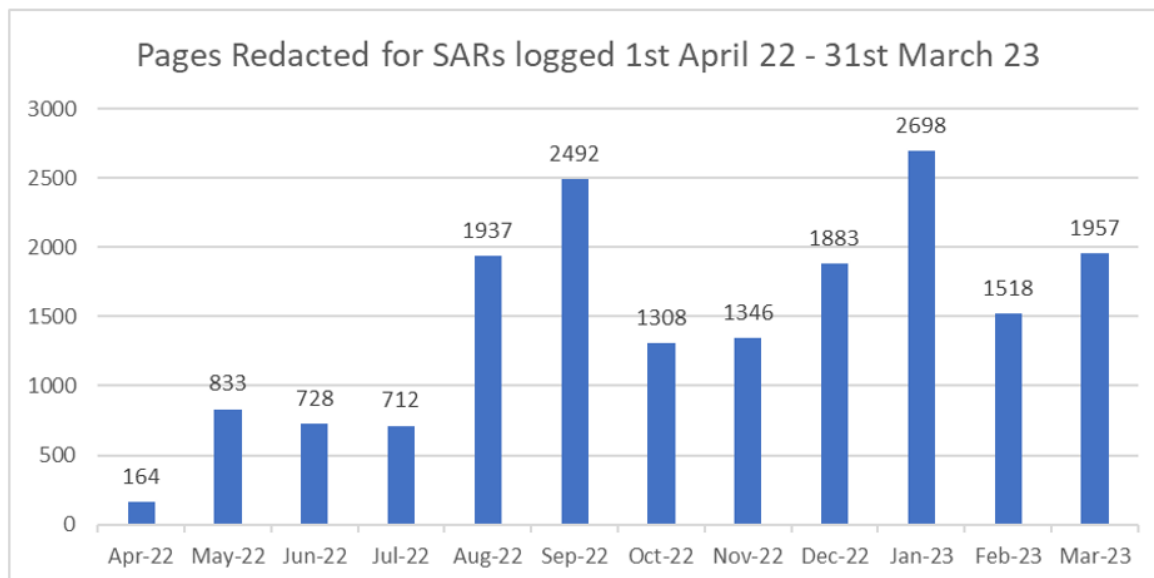
* Includes NCT SAR's April to Oct 21

FOI section 11A requires the council to look to publish commonly requested information as new datasets. Some common request themes are beginning to emerge. We are working with several services including Housing Options and Environmental Health to look at what can be published to reduce the burden of responding to these common requests. Identifying and setting out a publication timetable (ideally quarterly) helps the service programme in updates to the datasets rather than collating new data for each request as they are received. It also makes it simpler to respond by providing a web link to the current and future data thereby reducing repeat requests from the same applicants. Using datasets in this way has proved extremely beneficial in the past to significantly reduce requests numbers. Two prime examples are non-domestic business rates (NNDR) and public funerals.

Work is continuing to merge the various Transparency Code (open data) held on the legacy council websites. An update on this work will be provided in the next IG audit report update.

2.2 Subject Access Requests (SAR's)

Often an overlooked aspect of SAR's, over the number of requests received, is the amount and complexity of the redaction. All redactions are double checked to help ensure personal data of other individuals is not inadvertently released. Though very time consuming this is a critical step to ensure the risk of a data breach is kept to an absolute minimum.



2.3 Data Governance including subject access requests

The Data Protection team currently consists of the Data Protection Officer and two full time officers. The team is designed primarily to assist West Northants in meeting its requirements under the UK GDPR Principles (Art 6 to 11) and the Rights of the data subject (Art 12 to 23) as derogated by the Data Protection Act 2018. In reality the team is predominantly managing the ever-growing number of complex and voluminous SAR's (Subject Access Requests).

During the past quarter, this entailed a daily average of completing 1.16 subject Access Requests, 70 pages of redaction and 2 exemption requests (typically from the Police, DWP, Home Office Immigration or National Fraud Initiative trace work).

2.4 DPIAs

Some of the ongoing projects requiring the use of a Data Protection Impact Assessment.

| Project | Service Area | Case number | Signed off in quarter |
|---------------------------------------|--------------|-------------|-----------------------|
| Assistive Technology - Disaggregation | Adults | 1150/23 | |
| Supported Living Review Team | Adults | 1149/23 | |
| ERP Gold – New cloud authentication | HR / DTI | 961/23 | |
| Income Management System (IMS) | Finance | 858/23 | 18 th May |

2.5 Records Management

The records management team has just commenced work. The team will help the organisation to know what information it has and where it is (Information Asset Register (IAR)). This will be achieved in a number of ways including the management of external document storage, promoting electronic document management, overseeing the corporate retention policy and working with the departmental Information Asset Owners (IAOs) to improve service data management. However, an initial focus for the team will be the management and (cost) minimisation of physical document storage in the context of ongoing building moves, closures and the renewal of the off-site document storage contract.