Voluntary Information Commissioner Audit - Detailed findings and action plan

In June 2013, the Council made a request to the Information Commissioner's Office (ICO) for an audit of our records management (RM) arrangements and Subject Access Request (SAR) processes. The ICO produced a report containing some 36 recommendations to improve arrangements for both. The recommendations have been used as an action plan to help to improve the Council's management of its records and handling subject access requests.

The Information Rights Officer provided an update to the Corporate Governance and Standards Committee on 26 March 2015, showing that the Council had met or was complying with many of the recommendations. The Committee agreed that the Information Rights Officer would provide a further update with the annual information rights compliance report.

The remaining recommendations are set out below together with progress as at 30 April 2015.

Action plan and progress

Outstanding Recommendation	Progress at 30 April 2015	Officer Responsible for action
A4, A5, A6. Develop an overarching policy that documents Guildford Borough Council's approach to records management, supports the RM function and provides a framework for supporting documents such as procedures and disposal schedules.	**IN PROGRESS – COMPLETION TARGET: 01 July 2015** The Records Management Standards have been drafted and approved by the records management project group. They will be taken to Management Team during May 2015. This document will set out the Standards for the Council overall, and will be used by each Service to create their own set of local standards, based on their own needs. That target date for CMT approval of the standards is 01 July 2015. Therefore, the records management actions shown in this table as "in progress" are expected to be completed by 01 July 2015.	Darren Spice Information Systems Manager
A10. Ensure the provision of data protection refresher training on an annual basis. Review training content on an annual basis so it remains	**COMPLETED/ONGOING** On line refresher training is being rolled out to staff who have	Vincenzo Ardilio – Information Rights Officer

	attended training more than a year ago via NetConsent. This allows training to be monitored across the Council.	
A11. Ensure there is appropriate records management training commensurate with specialised staff duties. General records management requirements for all staff should be included in the corporate training.	**IN PROGRESS – COMPLETION TARGET: DECEMBER 2015** The Records Management project group will roll out training on records management, following approval of the standards. This training will be completed by the end of 2015, and is likely to tie in with overall changes the Council's use of SharePoint and other document and records management systems.	Darren Spice Information Systems Manager
A12. Review and formalise the local elements for training and monitor their deployment, ensuring they are consistent with corporate standards.	**IN PROGRESS – COMPLETION TARGET 30 NOVEMBER 2015** Following approval of the standards by 01 July 2015, the Records Management project group will plan training on records management as part of the overall project during the period 1 July to November 2015. Training sessions for each Service will be included in this plan, based on their own local needs.	Darren Spice Information Systems Manager
A18. Implement formal requirements to monitor and return records that are taken out of the office for extended periods.	**IN PROGRESS – TARGET FOR COMPLETION 30 SEPTEMBER 2015** In order to meet the individual needs of each Service this will be completed at a local level, following the approval of the overall records management standards by 01 July 2015.	Darren Spice Information Systems Manager
A20. Implement procedures to monitor the return of archive boxes.	**IN PROGRESS – TARGET FOR COMPLETION 30 SEPTEMBER 2015** In order to meet the individual needs of each Service this will be completed at a local level by 30 September 2015, following the approval of the overall records management standards.	Darren Spice Information Systems Manager
A21. Produce guidance for the archiving	**IN PROGRESS – TARGET FOR COMPLETION 30**	Darren Spice

requirements to ensure records can be tracked and retrieved. Where records are of limited use for the purposes for which they were collected, consider whether they can be destroyed.	**SEPTEMBER 2015** As above – for completion during 1 April to 30 September 2015	Information Systems Manager
A25. Consider separating data controllers, to reduce the risk of unauthorised access or disclosure of personal information.	The data controllers are Guildford Borough Council, Surrey County Council and Surrey Police who share the Millmead complex. Information should not be shared between these separate legal entities in an ad-hoc manner. The Head of Business Systems was arranging a meeting with representatives from each of the data controllers to agree some ground rules in terms of maintaining confidentiality where necessary and to consider any other arrangements to ensure an appropriate separation of duties in respect of personal information. However, he has now left the Council. This project will be picked up by his replacement who is scheduled to start in June. A new target date will be agreed.	Interim Head of Business Systems
A31. Ensure that PDF files can be protectively marked in line with the requirements, or introduce an alternative measure for dealing with PDF files and train staff appropriately. For example, the use of safe haven procedures for fax usage.	**COMPLETED/IN PROGRESS – TARGET FOR COMPLETION 30 SEPTEMBER 2015** The Boldon James File Classifier product has now been purchased and will be made available for all users during 2015,. This product uses the same classification policy as the Office Classifier product, which is currently in use by staff at the Council. The existing Office Classifier requires an upgrade before File Classifier can be implemented. This has been delayed due to the technical issues related to upgrading and rolling out new software to the VDI devices and staff commitments to other projects.	Darren Spice Information Systems Manager
A33. Ensure that all services develop and implement retention schedules for their manual records.	**IN PROGRESS – TARGET FOR COMPLETION 1 JULY 2015** The new Records Retention and Disposal Schedule has been drafted. This will be submitted for CMT approval with the Records Management Standards by early June 2015. This will	Darren Spice Information Systems Manager

	become a working document that is continually updated by each Service.	
A34. Implement retention schedules for electronic records that are held by GBC. Ensure that schedules are reviewed regularly so they continue to meet business needs and statutory requirements.	See above (this is part of the Records Retention Schedule)	Darren Spice Information Systems Manager
A37. Ensure appropriate RM performance measures are developed and that records management compliance reporting is fed into the relevant group / individuals.	**IN PROGRESS – TARGET DATE FOR COMPLETION 1 JULY 2015** Overarching performance measures have been discussed by the Information Risk Group and will be incorporated into the Records Management Standards	Darren Spice Information Systems Manager Martyn Brake Executive Head of Organisational Development
A38. Where elements of existing policy contain records management requirements, these should be monitored and reported on to assure compliance.	**IN PROGRESS** This forms part of the Records Management Standards referred to above.	Vincenzo Ardilio – Information Rights Officer
A40. Consider adapting the Statement of Information Assurance to incorporate elements of records management.	**TARGET FOR COMPLETION AUGUST 2015** The Council's ICT developers are building a Configuration Management Development Database (CMDB) that will hold information asset information linked to risk assessments, working procedures and controls. The information asset information will be added as a separate module by August 2015.	Martyn Brake – Executive Head of Organisational Development Darren Spice – Information Systems Manager
A43. Include risks from local information asset	See above (A40)	See A40

registers within the corporate risk register where appropriate.		
A44. Where risk to information assets are identified as requiring a control, ensure these are recorded on the information asset register	See above (A40)	See A40
A45. Ensure that all information assets are assessed for risk. Where the workload is excessive consider allocating responsibility to additional staff.	**COMPLETED/ONGOING** Awareness of this requirement has been raised through the Privacy & Information Security Liaison Group and through local management team meetings. Overall success is also dependent on the above recommendations relating to information assets.	Vincenzo Ardilio – Information Rights Officer
A46. Ensure there is oversight of information asset risks and that any controls are tested for adequacy.	**COMPLETE/ONGOING** This is a training and awareness issue. This is raised at the Corporate Data Protection training and included as a standing agenda item on Information Risk Group agenda and Privacy & Information Security Liaison Group. IRO will incorporate adequacy tests into a programme of compliance testing samples, which will be carried out during the 2015/16 financial year.	Vincenzo Ardilio – Information Rights Officer
B4. Additional resource should be provided to support and cover leave or other absence of the Information Rights Officer.	**AGREED ACTION COMPLETED** Information Governance Champions appointed in each service area to coordinate local compliance	Vincenzo Ardilio – Information Rights Officer/ Executive Heads of Service

B16. Guildford Borough Council should ensure services have delegated responsibility for ensuring the appropriate progress of SAR processing and for monitoring and reporting this to the Information Rights Officer.	**IN PROGRESS – TARGET FOR COMPLETION JULY 2015** This is in line with B4. Subject Access Requests are monitored through the Privacy & Information Security Liaison Group Completion is dependent on the introduction of the Firmstep solution as a platform for dealing with SARs. The use of the Firmstep solution for the management of the SAR will be completed once the solution has been successfully implemented as a solution for managing the FOI process as described in B21.	Vincenzo Ardilio – Information Rights Officer Darren Spice Information Systems Manager
B21. Introduction of a work flow based system with facilities such as automatic email reminders should be prioritised to reflect the problem of late SAR completion.	**IN PROGRESS – TARGET FOR COMPLETION JUNE 2015** This is subject to the introduction of the Firmstep solution as a platform for dealing with SARs. The solution is a 'off the shelf' process that runs as part of the overall Firmstep CRM solution purchased by the Council. Firmstep have encountered some difficulties during the implementation of the solution which has delayed the roll out.	Darren Spice Information Systems Manager
B33. Guildford Borough Council should ensure that the proposed replacement for the Subject Access Request System can retain central records of all 3rd Party disclosure requests.	**IN PROGRESS – TARGET FOR COMPLETION JULY 2015** This is subject to the introduction of the Firmstep solution as a platform for dealing with SARs, as detailed in B16.	Darren Spice Information Systems Manager