

Report to Corporate Governance & Standards Committee on 2015 Compliance

Appendix 1

Table 1 - Freedom of Information (FOI) and Environmental Information Regulations (EIRs) during 2015 in comparison to 2014.

	2014	2015	% +/- over prev. year	Comments
Number of formal requests	848	672	-20%	Since 2005, this was the first decrease in the annual number of requests received
Performance (% of requests dealt with within statutory 20 working days)	69%	81%	+17%	Performance did not meet the Information Commissioner's minimum compliance threshold of 85 per cent.
Number of known referrals to the ICO	9	5	-44%	<p>FER0567827 (Our reference 1865): ICO received appeal but did not contact us again in relation to the investigation</p> <p>FS50580755 (Our reference: 2095): ICO closed the case and did not proceed to Decision Notice</p> <p>FER0594317 (Our reference: 2540): Decision in Council's favour. However, at the time of writing the applicant had appealed to the First Tier Tribunal (FTT)</p> <p>FER0605501 (Our reference: 2679) Decision: Council ordered to release the withheld information. The Council has appealed to the FTT in respect of some of the information</p> <p>FER0611301 (Our reference: 2809) Decision in the Council's favour.</p>

Table 2 - the number of requests received by each directorate during 2015

Directorate	TOTAL Number of Requests 2015	2015 Late Responses	% On time
Chief Internal Auditor	4	2	50
Corporate Services (Democratic, Electoral, HR, Legal, Policy and Partnership, PR and Marketing, Web programme)	60	6	90
Development	72	7	90
Community Services	213	60	72
Environment	89	21	67
Resources	280	21	89
Management Team	9	1	89

Table 3 - The Council's performance in relation to data protection and privacy during 2015 in comparison to 2014

	2014	2015	%+ / (-) over 2014
Number of Subject Access Requests:	16	12	-25%
Percentage of requests resolved within 40 days	46%	66%	+44%
Number of these known to have been appealed to the ICO and investigated	0	0	0
Number of security and or confidentiality breach allegations reported to the Information Rights Officer under the information risk incident report procedure	9*	10	+10%
Number of the above, which the Council reported to the ICO	2	0	Decrease

Table 4 – Summary of information risk incidents in 2015

Ref	Summary of incident	Cat	Outcome/Recommendations
IRB38	<p>System or process: iNovem Planning Consultation Database.</p> <p>Date: February 2015</p> <p>Information Asset Owner: Director of Development</p> <p>Information Asset Administrator: Principal Policy Officer</p> <p>A resident complained that they had received an unwanted communication about community climate change. The responsible officer had created the mailing list from the planning consultation database</p>	0	<p>This was a low risk incident but did highlight that the iNovem database was not managed according to documented local working procedures.</p> <p>The Principal Policy Officer agreed to produce local working procedures for the iNovem Consultation system to ensure any re use of the mailing list complied with the data protection principles.</p>
IRB39	<p>System or process: Council Tax Benefits process</p> <p>Date: March 2015</p> <p>Information Asset Owner: Director of Resources</p> <p>Information Asset Administrator: Council Tax Manager</p> <p>A resident received a Local Council Tax Support letter relating to someone else with their Housing Benefit Letter.</p>	1	<p>This was a confirmed information risk incident, which most likely occurred during the posting stage. The investigation of this incident and actions were incorporated with a system review arising from further incidents (IRB41 and IRB43)</p>
IRB40	<p>System or process: Planning applications</p> <p>Date: April 2015</p> <p>Information Asset Owner: Director of Development</p> <p>Complainant alleged that objectors' email addresses had been published on the Council's website</p>	0	<p>Unconfirmed. No evidence of the allegation was found and the complainant did not respond to a request for a link to the web page in question.</p>

Ref	Summary of incident	Cat	Outcome/Recommendations
IRB41	<p>System or process: Benefits and Rents Notifications matching process</p> <p>Date: June 2015</p> <p>Information Asset Owner: Director of Resources</p> <p>Information Asset Administrator: Council Tax Manager</p> <p>Resident contacted the Council because she had received a Housing Benefit award notice relating to another resident together with her own.</p>	1	<p>This was a confirmed risk incident. The Council Tax Manager carried out a full review of processes following the incidents IRB39, IRB41 and IRB43.</p>
IRB42	<p>System or process: "Follow Me" printing on the Multi-Functional Devices (MFD).</p> <p>Information Asset Owner: ICT Manager</p> <p>Date: July 2016</p> <p>Information Asset Administrator: not established at time of the incident but subsequently agreed to be the ICT Customer and Technical Support Manager</p> <p>An officer discovered a bundle of documents that had been printed on their local MFD. There were around 100 pages from various services and a substantial amount of the information was sensitive personal data. It transpired that printing initiated on Electra (near Revenues and Housing, New Millmead) was being produced on Scorpion (near Asset Management, Old Millmead). The officers using Electra had assumed there was a fault with that MFD as the printing had disappeared from their control screen and so they re-sent their documents and picked them up from an alternative MFD.</p>	1	<p>This was a confirmed risk incident that had potential to be more serious. The reason it was assessed as low level is because it was contained within the Council and no external disclosure took place.</p> <p>Responsibility for the MFDs had not been allocated and therefore no risk assessment had been carried out during the procurement and installation</p> <p>The cause of the problem was a floating IP address – a technical oversight when the MFDs were set up for use, which was subsequently corrected.</p> <p>Staff instructions for reporting printing problems and deleting print jobs were produced and posted at all MFD sites</p>

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	<p>However, the original printing had been produced by Scorpion and was therefore in an insecure environment for several days until discovery.</p>		
IRB43	<p>System/Process: Council Tax Support</p> <p>Information Asset Owner: Director of Resources</p> <p>Information Asset Administrator: Council Tax Manager</p> <p>Date: July 2015</p> <p>A resident reported that she had received a Local Council Tax Support notification intended for someone else included in her own notification and returned the documents to the Council.</p>	1	<p>Outcome of review of processes affected by IRB39, IRB41 and IRB43</p> <p>Housing Benefit and LCTS Notification Procedures</p> <p>Matched bills and notifications are now presented to Reprographics in a revised format and crosschecked. The revised process was reviewed after two months and no further incidents reported.</p> <p>Auto matching using bar codes was under consideration as was use of an external supplier to print.</p>
IRB44	<p>System/Process: Staff overtime/ email</p> <p>Information Asset Owner: Director of Corporate Services, Director of Resources</p> <p>Information Asset Administrator: Acting HR and Performance Manager, ICT Manager</p> <p>Date: August 2015</p> <p>An email containing details of an officer's overtime payments was emailed from Street Cleaning to HR with an unrelated officer courtesy copied in error. No sensitive information was involved.</p>	0	<p>This was human error, which arose due to autocomplete being activated in Outlook. I have previously recommended a corporate switch-off of auto complete.</p>

Ref	Summary of incident	Cat	Outcome/Recommendations
IRB45	<p>System/Process: Occupational Health Contract</p> <p>Information Asset Owner: Director of Corporate Services</p> <p>Information Asset Administrator: Head of HR & Business Improvement</p> <p>Date: August 2015</p> <p>A member of staff reported that they had found a confidential HR email on their printer. The email related to the Occupational Health Contract</p>	0	No evidence that personal information was involved
IRB46	<p>System/Process: MFDs</p> <p>Information Asset Owner: Director of Resources</p> <p>Information Asset Administrator: Not established at time of incident</p> <p>Date: October 2015</p> <p>Five documents containing personal information left on Storm printer</p>	1	<p>Delayed printing was the issue due to the document settings. The printer displayed an error message but produced the printing later on after the officer had left the vicinity.</p> <p>Larger staff guidance posters displayed at MFD sites and incorporated into training programme</p>
IRB47	<p>System/Process: Debtors</p> <p>Information Asset Owner: Director of Corporate Services</p> <p>Information Asset Administrator: Head of Financial Services</p> <p>Date: December 2015</p> <p>Debtors routed reminder letters and copy invoices to a different printer than normal and a member of staff from another service based near the location of the printer picked them up. This member of staff had no business 'need to know'.</p>	0	<p>Low level incident (near miss rather than breach)</p> <p>No sensitive or personal information was involved but due to the potential for a repeat incident involving sensitive information, the Head of Financial Service carried out a risk assessment and reviewed local working procedures.</p>

Cat (category)

0 - near miss

1 – Locally managed incident

2 (and above) – requires report to the Information Commissioner's Office.