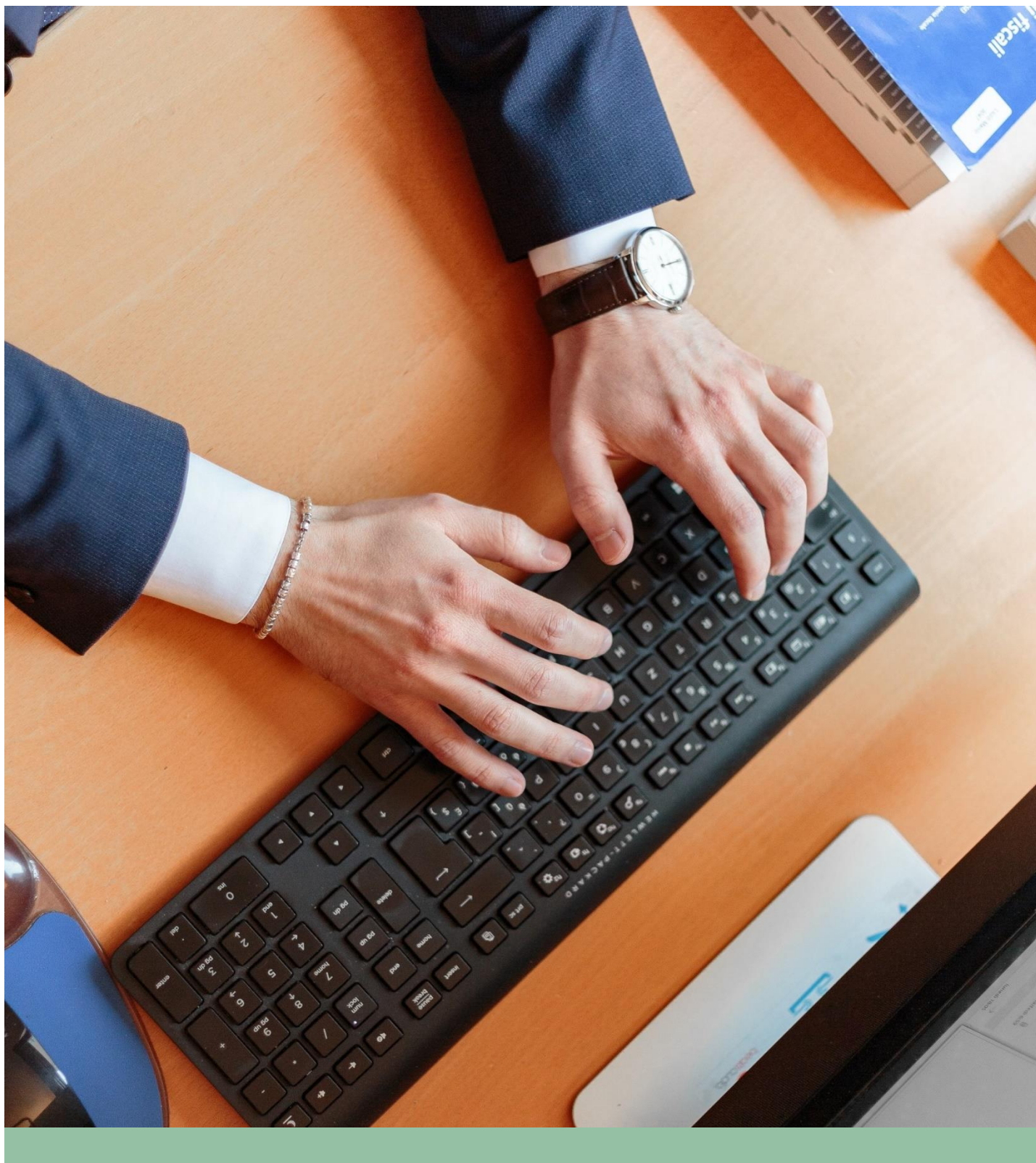










INFORMATION GOVERNANCE ANNUAL REPORT

Date: 29th March 2023

ANNEX 3



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- The UK General Data Protection Regulation (UK GDPR)
- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- Regulation of Investigatory Powers Act 2000

4 In March 2018, the Council appointed Veritau to be its statutory Data Protection Officer (DPO).

5 The Corporate Information Governance Group (CIGG) is responsible for overseeing information governance within the Council. The group is chaired by the Council's Chief Information Officer and provides overall leadership on all information governance matters. CIGG also includes the Council's Information Risk Owner (the Council's Chief Information Officer) and the Council's Information Governance Officer.



UK GDPR ACTION PLAN UPDATE

6 The 2022/23 action plan was reported to CIGG in March 2023. The action plan was updated as work was completed. No new actions were added to the 2022/23 action plan as CIGG's focus is on the completion of outstanding work in the lead up to the next day.

7

Veritau completed the process of applying relevant changes to the privacy notices via consultation with service areas. Privacy notices have been updated to the Council website including Planning Policy, Complaints and Explore Heart of Yorkshire. Updates have been applied to the corporate website. Veritau is the lead of the Information Governance Committee. Veritau is also the lead of the Information Governance Committee. Veritau is also the lead of the Information Governance Committee. Veritau is also the lead of the Information Governance Committee.

privacy notice. Veritau has undertaken a further review to determine the consistency of all District Council Privacy Notices prior to Local Government Reorganisation to align notices providing information about core services and identify duplicate notices with North Yorkshire County Council. This exercise is now complete.

- 8 All policies required for the Council's IG Framework are complete and have been published on the Intranet.
- 9 A review of the Information Asset Register (IAR) was completed on 31st March 2022, which reflects UK GDPR compliance needs and now includes columns for law enforcement processing. The IAR along with those of other North Yorkshire councils will inform an IAR for the new North Yorkshire Council after vesting day.
- 10 Agreement was reached to align the process to review data processing contracts with the LGR workstream for Procurement. However, due to competing priorities for all areas of LGR it was decided that the work will be completed after vesting day.
- 11 An assessment of the Council's information sharing with other data controllers was undertaken in 2022. A gap analysis presented to CIGG highlighted some areas of concern. Like the Data Processing Contracts, a decision was made not to progress this work further and the intention is to undertake a further review by the new authority post vesting day.

TRAINING

- 12 Sixty members of Council staff attended three workshops Veritau organised to provide training on Information Incident Management in November and December 2022. This training provided staff with information about how to recognise an information incident, what to do in the event that they experience one, and the importance in the Council acting quickly.
- 13 CIGG has proactively encouraged staff to complete the mandatory IG training during the year, and as of 2 March 2023, 95% have completed this. Taking into account long-term staff absences due to illness or maternity leave, this figure informs us that the vast majority of staff have now completed this essential training prior to LGR vesting day.

INFORMATION SECURITY INCIDENTS (DATA BREACHES)

- 14 All information security incidents are assigned a risk rating. This is a five-level RAG system with risks ranging from very low to very high. The rating is assigned based on a risk score assigned as part of the data breach investigation. Risks classed as high or very high are sufficiently serious to be considered for self-reporting to the Information Commissioner's Office (ICO). Some incidents are categorised as 'white'. White incidents are where there has been a failure of security safeguards, but no breach of

confidentiality, integrity, or availability has actually taken place (that is the incident was a near miss).

- 15 Information Security Incidents have been reported to Veritau as required during the year. The number of Security Incidents reported to the Council and Veritau in 2022/23 are as follows:

	Very High	High	Moderate	Low	Very Low	White	Total
Q1					1		1
Q2				2	2		4
Q3				1	2	3	6
Q4*				1		1	2
Total	0	0	0	4	5	4	13

* Information correct up to and including 2 March 2023

- 16 There has been an increase in the number of security incidents reported in 2022/23 from the 11 reported in 2021/22. However, no incident was risk assessed any higher than a low-risk incident and none were reportable to the Information Commissioner's Office.



SUBJECT ACCESS REQUESTS - INTERNAL REVIEWS - FREEDOM OF INFORMATION

- 17 As part of a revised agreement, Veritau took over the responsibility for processing Council data protection subject access requests (DPSARs) and provision of advice on complex Freedom of Information (FOI) requests on 1 February 2022. As of 2 March 2023, Veritau has processed fourteen DPSARs on behalf of the Council and provided support on six complex FOI requests. In addition, Veritau has provided support to one Internal Review for a subject access request.



DATA PROTECTION IMPACT ASSESSMENTS

- 18 Veritau supported the Council in completing several DPIAs in 2022/23 as well as providing advice on whether a DPIA was required for other projects.
- 19 Work is ongoing on a few DPIAs. These include MyView, CCTV for Selby town centre, and Breathing Space (a scheme administered by Wakefield Metropolitan District Council on behalf of Selby – it offers interest free secured loans to pay for an individual's mortgage arrears and support for up to 12 months of mortgage payments). There are still important aspects to complete for each of these DPIAs and this work will continue within the new authority post vesting day.



LAW ENFORCEMENT

- 20 The Council has completed all necessary work to ensure compliance with Part 3 of the Data Protection Act 2018 (Law Enforcement). Consideration will be given to a broader programme of training within the new authority during 2023/24.

TECHNOLOGY

- 21 One of the key steps to prepare for the transfer to North Yorkshire Council is having all staff on the same Microsoft 365 system. Being on the same system allows everyone to work together effectively after vesting date. The work to move Selby District Council officers to the new Microsoft 365 system is scheduled to take place in the week commencing 13th March 2023. Work to transfer the other district councils will be complete by 1st April 2023. Once all Councils are on the same system then Veritau will begin to coordinate the application of retention management on documents held within the network.