



**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

Agenda Item No: 13

Information Governance Update

To: Audit and Governance Committee

Meeting Date: 11 March 2022

Public report: Public Report

From: Sue Hall
Governance Assistant

Recommendations: The Audit and Governance Committee is invited to:

- a) Note the Information Governance Update
- b) Note the data on and freedom of information (FOI) requests, environmental information regulation (EIR) requests, whistleblowing disclosures and corporate complaints for September 2021 to March 2022

Voting arrangements: Note only item, no vote required.

1. Purpose

- 1.1 To update the Audit and Governance Committee on the current position with regards to Information Governance, and to provide data related to the number of corporate complaints and Freedom of Information requests for the period of 1 September 2021 to 28 February 2022

2. Background

- 2.1 The Committee agreed that six-monthly reports should be presented on the number of data breaches and how they were handled, number of complaints received, timings of FOI's and cases referred to the ICO.

2.2 The table shows progress to date and the target completion date.

Recommendation	Progress and Target Date for Completion (TDC)
Update policies where necessary	<p>Socitm have drafted the following policies and they are now in use:</p> <ul style="list-style-type: none"> • Device loan agreement • Damage device policy <p>These are attached to the report as an Appendix</p> <p>Socitm are working with RSM who are reviewing the following:</p> <ul style="list-style-type: none"> • Acceptable usage agreement • Backup policy • IT disaster recovery <p>Target completion date – end of March 2022</p>
Introduce Staff training programme to cover data protection and information/cyber security	<p>All officers within the Combined Authority have undertaken mandatory online Data Protection training provided by Cylix Limited. All temporary and permanent staff are sent instructions during their first week with the CPCA regarding the training.</p> <p>Staff also undertook Data Protection training in January 2022. This was a Data Protection refresher and to inform all staff of the new policies. The training was delivered by PCC/CCC Data Protection Officer who supports the CPCA on Data Protection.</p> <p>IT security training by Cylix is being finalised for delivery across the organisation. Target completion - Spring 2022</p>
Introduce Data Privacy Impact Assessments (DPIAs) for all new projects which involve the processing of personal information – A Data Protection Impact Assessment (DPIA) is a process to help identify and minimise the data protection risks of a project. A DPIA must: • describe the nature, scope, context and purposes of the	<p>The DPIA policies and forms have been created. Training on completing the form was delivered on 22 February 2022 by PCC/CCC Data Protection Officer who supports the CPCA on Data Protection.</p>

processing; • assess necessity, proportionality and compliance measures; • identify and assess risks to individuals; and • identify any additional measures to mitigate those risks	
Encryption of emails and removal of auto-populate function, regular penetration tests Penetration tests which is a process whereby an external specialist company is commissioned to investigate your environment for vulnerabilities i.e., attempting to hack the system.	Socitm have just promoted the Combined Authority's Microsoft licences that include additional security features, one in particular is data sensitivity tagging an example would be marking a document/email as "sensitive". Controls can be applied to that tag to stop forwarding, printing, editing, copy and pasting and now taking screen shots. Socitm are also looking at exchange and boundary encryption to compliment this. Socitm are currently reviewing the processes needed to remove the cached address book on people's machines for external only emails. This will remove the risk of accidental data breaches where incorrect contacts have been used.
Conduct information audit and update Information Asset Registers An asset register records assets, systems and applications (e.g. word documents, archived emails, spreadsheets, databases, etc) used for processing or storing personal data across the organisation and was introduced as a requirement by the GDPR	This is referred to in the Data Protection Policy. It is yet to be implemented. TCD by Summer 2022
Review duplicated files	This is being included as part of the data re-design that is in the sign off stages. Work expected to be completed 1 week after approval.
Convene monthly Information Risk Group meetings	These meetings take place monthly.

2.5 Freedom of Information (FOI) and Environmental Information Regulations (EIR) requests

During the period 1 September 2021 to 28 February 2022 (6 months) the Combined Authority received 14 requests for information under the Freedom of Information Act and a further 1 request for information under the Environmental Information Regulations. All requests and responses have been published on the Combined Authority's website. The topics of the requests upon which FOI and EIR requests were made are:

- OxCam Art
- Cycling/Cycle paths
- Energy in CPCA offices
- Cost of Ting Services
- Community Renewal Bids
- Salary of the Mayor
- Land at Camp's Field, Wilburton
- Procurement Policy
- Foster Carers
- E-scooters
- Services/projects funded that work with a range of support that include substance misuse or substance use disorders
- Chalk Streams Project
- Highways
- Bus Lanes

Performance for this period was as follows:

All of the FOI and EIR requests were responded to within the timeframe of 20 working days Except one FOI which required extra time to consider the public interest test.

2.6 Whistleblowing Disclosures

The Combined Authority has received 1 whistleblowing disclosure for the period 1 September 2021 to 28 February 2022.

2.7 Corporate Complaints

During the period of 1 September 2021 to 28 February 2022 the Combined Authority received 0 complaints.

Significant Implications

3. Financial Implications

3.1 None

4. Legal Implications

4.1 The Data Protection Act 2018 and the UK General Data Protection Regulations governs UK data protection following withdrawal of the UK from the EU.

5. Other Significant Implications

5.1 None

6. Appendices

6.1 Appendix

The following are attached:

- Device loan agreement
- Damage device policy

7. Background Papers

None.