

<b>Report to:</b>	QSMTM
<b>Report by:</b>	Helen Gardner-Swift
<b>Meeting Date:</b>	1 June 2018
<b>Subject/ Title:</b> (and VC no)	<b>Information and Records Management Assurance Report</b> VC102994
<b>Attached Papers</b> (title and VC no)	None

## Purpose of report

---

1. To present the Information and Records Management Report (set out in the Appendix) and this assurance report as required by the Governance Reporting Arrangements.

## Recommendation and actions

---

2. The following is recommended
  - (i) the report is noted
  - (ii) the report is published in full

## Executive summary

---

3. The report identifies a good level of compliance with our Information and Records Management Policy and the procedures set out in the Handbook and Records Management Handbook.
4. The report also identifies some areas where further work is required - these areas relate to development and implementation of revised retention and destruction processes in VC, the assessment of the current review arrangements relating to Key Documents and a review of the assurance arrangements. These areas are set out as a Project Activity for me to undertake within 2018-19.
5. The SMT is asked to note the report.

## Risk impact

---

6. This assurance report and our information management contribute to the control measures aimed at reducing the likelihood and impact of risk 13 re information governance in the current Operational Risk Register.

## Equalities impact

---

7. No equality issues arise from this internal review of compliance with policy and procedures.

## Resources impact

---

8. The three actions to be carried out as a project in 2018-19 will require additional staff resource and it is anticipated that this can be met from existing staff resources.

## **Operational/ strategic plan impact**

---

9. None

## **Records management impact (including any key documents actions)**

---

10. None other than the identified project for 2018-19.

## **Consultation and Communication**

---

11. QSMTM minute and the internal blog.

## **Publication**

---

12. I recommend that this committee report is published in full.

## Records Management Report 2017-18

### Are records being held for the appropriate time?

---

File Plan and Retention Schedule (VC72711)(the Schedule)

1. The Schedule contains detailed rules for the retention of our records. The content reflects statutory and business requirements but will need to be updated following the review of retention periods regarding personal information undertaken as part of our GDPR implementation (the relevant retention periods relating to personal information are set out in our Privacy Notice which can be accessed at:

<http://www.itspublicknowledge.info/home/privacy.aspx>

2. The Schedule has been applied to the extent described above.
3. The Schedule will be reviewed as part of the Operational Plan 2018-19 project described above and will be submitted to the Senior Management Team (SMT) for approval.

#### Simply Personnel (SP)

4. There is currently no process for the management of the content of the SP database.
5. This represents a low risk with the key aspect being the management (i.e. deletion) of personal details held for former employees.
6. However, we retain such data for 7 years following termination and, as SP was only implemented in 2013, there are currently no qualifying records.
7. A retention plan for SP will be put in place this year.

### Are records being destroyed at the appropriate time?

---

8. The procedures for the archiving/deletion of information held in Workpro and ACT! are working well and information is being archived and deleted.
9. Processes for the management of Outlook, P and Z drives, paper records and key documents are also being implemented routinely.
10. The project to revise the retention periods for records held in Virtual Cabinet was put on hold pending preparations for GDPR. This project will be restarted during 2018-19 (it forms part of an IRM project that I will be undertaking). It is hoped that we will be able to create some automated processes and tasks to support the records review processes subject to our duties and responsibilities as regards data protection and personal information.
11. Once revised retention periods have been agreed, further work will be required to modify the Retention Schedule and then to configure VC to perform any new automated processes in line with the agreed retention periods.

## Is information held securely?

---

12. Various improvements arising from a security review which took place in 2015-16 were implemented and security has been further reviewed as part of GDPR implementation. There are a range of security procedures and items in place which include
  - (i) controls over access to SIC's network for maintenance purposes
  - (ii) external penetration testing
  - (iii) firewall monitoring and enhanced provision
  - (iv) server access controls
  - (v) Cyber Essentials – work undertaken as part of the pre-assessment process
  - (vi) Cyber warning systems – updates and blog messages to staff regarding any current threats
13. We are will be applying for Cyber Essentials and Cyber Essentials Plus accreditation in July 2018.
14. We have in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
15. We also limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know.

## Data Breaches

---

16. We have also have in place procedures (VC39963) to deal with any suspected data security breach and will notify the person and any applicable regulator of a suspected breach where we are legally required to do so.
17. Three incidents occurred in 2017-18 and were notified to the SMT, one of these was reported to the ICO and no further action taken by the ICO.
18. We have appointed a DPO to oversee our compliance with data protection requirements.

## Are appropriate back-up arrangements in place?

---

19. Appropriate back-up arrangements are in place
  - (i) backups are taken overnight each weekday and are stored off site.
  - (ii) the backup arrangements are monitored each weekday morning by Microsys who identify and report any issues.
20. The security review identifies carried out in 2015-16 recommended the consideration of other options which would obviate the current off-site storage arrangements. However, these options are costly to implement and a decision was taken to considered the options again at the same time as the IT maintenance and support contract is tendered (there is a project to review the arrangements for this contract in 2018-19).

## Are Key Documents being managed in line with the Handbook?

21. Key documents are being reviewed but there has been is slippage against the Review Schedule that is in place and this was noted by the auditors in their report for the financial year 2016-17
22. There is a streamlined process for non-substantive planned reviews to assist progress.
23. To assist with reviews, the Review Schedule is also considered at the monthly project board schedule.
24. There is a project to consider and recommend a way forward for reviews in the Operational Plan 2018-19.