

OFFICE OF POLICE & CRIME COMMISSIONER	
LEAD CHIEF OFFICER:	ACC Edwards / ACO-R Stephens
TITLE:	Information Services and Information Governance Out-turn Report 2018/19
DATE:	5th June 2019
TIMING:	Annual Report
PURPOSE:	For monitoring
1.	<u>RECOMMENDATION</u>
1.1	This report presents the first annual report of the Information Management and Governance services for the financial year 2018/19 for monitoring.
2.	<u>INTRODUCTION & BACKGROUND</u>
2.1	During 2018 the force reviewed the Data Management Department and implemented a revised structure which commenced in October 2018.
2.2	The revised structure was developed taking account demand, implementation of new systems and processes, centralisation of data management functions as well as the introduction of General Data Protection Regulation (GDPR).
2.3	The review concluded that the department be divided into two elements; the first being Information Governance which now resides under ACOR Stephens as Senior Information Risk Owner (SIRO) and the second being Information Services which continues to be managed by the Head of Criminal Justice & Data Management.
2.4	The reason for the structural change was in response to the introduction of GDPR on 25 May 2018 which necessitated an independence between the decision making for disclosure with the Data Protection Officer (DPO).
2.5	The new structure is provided at Appendix 1 for which most vacancies have now been appointed.
3.	<u>ISSUES FOR CONSIDERATION</u>
3.1	This report covers the key performance areas for both Information Governance and Information Services. These are monitored throughout the year by the Information Assurance Board.
3.2	The data capture and reporting arrangements were developed in line with the implementation of GDPR and therefore this report presents performance from this date for 2018/19.
3.3	INFORMATION SERVICES - DISCLOSURES

3.3.1	<p>Appendix 2 shows the breakdown month on month from June 2018 for the key performance measures for Information Services.</p> <p>The key performance areas are as follows:</p> <ul style="list-style-type: none"> • Subject Access Requests • Freedom of Information (FOI) • Children and Family Court Advisory and Support Service (CAFCASS) • Road Traffic Collision (RTC) Disclosure • Criminal Injury Compensation Authority (CICA) • Court Orders • Data Protection (S29/S35) • Legal Aid • Common Law Police Disclosures <ul style="list-style-type: none"> ○ Notifications ○ Disclosures
3.3.2	<p>Much of the work of the team is business as usual with requests for information being received from the various sources indicated above with specific response times. Much of the response times of the team have been within the required time periods although there have been fluctuations during the implementation of the new structure as the team concluded the recruitment process.</p>
3.3.3	<p>The FOI requirements have been delivered effectively throughout the year following the introduction of new management arrangements in 2018.</p> <p>There was one FOI review following an appeal that was received by the force during the year and this was resolved so there were no referrals to the ICO by the force or the complainant.</p> <p>The Publication Scheme has been reviewed with regard the information we provide s routine but the FOI responses have not been published on the intranet due to a technical issue with the upgrade to the server which is planned to be resolved by the end of May 2019.</p>
3.3.4	<p>The most significant change related to GDPR in which the charging arrangements for Subject Access Requests (SARs) was withdrawn. Initially there was a spike in demand, however the levels have returned to that of prior to the legislation changes.</p>
3.4	<p>INFORMATION GOVERNANCE</p>
3.4.1	<p>The Information Governance team oversee the compliance with information management targets and also advise on areas of risk to co-ordinate the identification, assessment and response.</p>
3.4.2	<p>The introduction of GDPR was managed through 2017/18 and progress reported at that time. The work was supported by a project and action plan and enabled the force</p>

	to be prepared on 25 May 2018. Much of the work has been implemented across the force and the remaining elements are reported through Information Assurance Board.
a	<p>GDPR</p> <p>The introduction of GDPR has enhanced the reporting arrangements in relation to data breaches. There have been thirty reported data breaches across the force as shown in Appendix 3 and summarised below which are RAG rated by the DPO.</p> <p>The breaches have been assessed for impact as follows:</p> <p>GREEN = 8 (Impact on data subject is minimal)</p> <p>AMBER = 16 (Subject suffers some damage or distress)</p> <p>RED = 2 (Impact on data subject is significant)</p> <p>No Breach = 4 (Following assessment it was deemed to that there was no breach)</p> <p>The force has referred eleven breaches to the Information Commissioners Office (ICO). Six of the breaches were assessed and closed with suitable advice given, with a further three closed following suitable action. The remaining two breaches relate to complaints; one reviewed and not upheld and the other awaiting the submission of the complaint.</p> <p>The main reason for data breaches recorded is the reporting of personal data and this accounts for 72% of all the force breaches.</p>
b	<p>RECORDS MANAGEMENT</p> <p>The Records and Compliance team provide advice and support to ensure that the organisation is compliant with Data Protection legislation. The programmes undertaken in 2018/19 are summarised below:</p> <p><i>Review of Interview Tapes /Videos and DVD's</i></p> <p>The force currently has 215,000 interview tapes stored. The Records Team have reviewed and are weeding these in line with the Management of Police Information (MOPI). A recommendation will be made to Chief Officers regarding digitisation of the remaining tapes once the weeding process is completed.</p> <p><i>Custody Images</i></p> <p>The team have reviewed and weeded approx. 70,000 historic custody images in line with MOPI. MOPI 1 (Required to retain for 100 years) images have been retained and will be digitised by the end of September 2019.</p> <p><i>Data Mapping</i></p> <p>A Project has commenced to review the flows of data internally and externally in each department. The CID workstream is complete and this process has identified a number of areas for improvement in respect to information sharing with partner agencies. It has also identified a number of systems which are not contained within Information Asset Registers.</p> <p><i>Information Sharing Agreements</i></p>

	<p>A review of all existing Information Sharing Agreements is taking place to ensure that they comply with the new legislation. The aim is to have a complete register of all Information Sharing Agreements which will be reviewed and managed by the Compliance team.</p> <p>Legacy Systems</p> <p>In liaison with the SRS a review of ICT legacy systems is being undertaken to enable their de-commissioning and transfer of data where necessary. The review will establish the legal implications of deletion or retention. These systems include ORIS, GDS, POLIS and Audio Soft.</p> <p>Pocket Note Books</p> <p>Paper Pocket Notebooks have been collected from officers so they can be collated, referenced and managed. The records teams has received over 5000 books and approximately half of these books were destroyed in line with the seven year retention period. The remaining books will be stored and will reviewed on an annual basis.</p> <p>Digitisation of Legal Documents</p> <p>An exercise is taking place to digitise Gwent legal documents</p>
4.	<u>COLLABORATION</u>
4.1	<p>The force agreed to a joint DPO role with South Wales Police to coincide with the implementation of GDPR. The joint role will advise the SIROs of both forces over many common areas as a result of the system and service alignment that has been created in collaboration across the forces. Further alignment will occur with the introduction of O365 Sharepoint which will enable the two forces to share documentation in a more accessible manner and this necessitates a single approach which the joint DPO can oversee.</p> <p>The joint post remains vacant and so temporary arrangements to cover DPO responsibilities are established in each force.</p>
4.2	<p>At the same time the force commenced a collaborative Project with South Wales Police on Information Management. The aim of the project is to align processes to maximise the benefits of the system alignment that has already taken place across Niche and FIRMS. These are joint systems and therefore the manner in which the information management functions access this data in responding to disclosure requests should be identical. Such alignment will enable interoperability across the functions, providing resilience to each.</p>
5.	<u>NEXT STEPS</u>
5.1	The force will continue to report its performance through the Information Assurance Board.
5.2	The remaining vacancies will be filled.
5.3	Work to align and converge on best practice processes will continue during 2019/20 with particular emphasis on Information Governance to support the introduction of the joint DPO role.

5.4	Planned Information Governance actions are detailed in Appendix 3.
6.	<u>FINANCIAL CONSIDERATIONS</u>
6.1	The new structure introduced in October 2018 provides the service at a total cost of £1,184,525 per annum.
7.	<u>PERSONNEL CONSIDERATIONS</u>
7.1	The force continues to pursue the appointment of a joint DPO role.
7.2	The remaining vacancies within the team will be filled during the first quarter of 2019/20.
7.3	Training and support is provided to staff to ensure they are able to meet the obligations of their role.
8.	<u>LEGAL IMPLICATIONS</u>
8.1	There are no legal implications at this stage.
9.	<u>EQUALITIES AND HUMAN RIGHTS CONSIDERATIONS</u>
9.1	This project/proposal has been considered against the general duty to promote equality, as stipulated under the Single Equality Scheme and has been assessed not to discriminate against any particular group.
9.2	In preparing this report, consideration has been given to requirements of the Articles contained in the European Convention on Human Rights and the Human Rights Act 1998.
10.	<u>RISK</u>
10.1	There are financial implications to the force not meeting its deadlines, however there are no current concerns based on performance.
10.2	The introduction of a single consistent Disclosure Team has improved the quality and consistency of disclosure by the force.
11.	<u>PUBLIC INTEREST</u>
11.1	There are no public interest matters.
12.	<u>CONTACT OFFICER</u>
12.1	David Broadway – Head of CJD & Information Services
13.	<u>ANNEXES</u>
13.1	Appendix 1 – Information Management New Structure
13.2	Appendix 2 – Information Services Performance
13.3	Appendix 3 – Data Breach Performance

For OPCC use only

Office of the Chief Constable

I confirm that the **Information Services & Information Governance Outturn** report has been discussed and approved at a formal Chief Officers' meeting.

It is now forwarded to the OPCC for monitoring purposes.

Signature:




Date: 07.05.19

Police and Crime Commissioner for Gwent

I confirm that I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct.

The above request has my approval.

Signature:



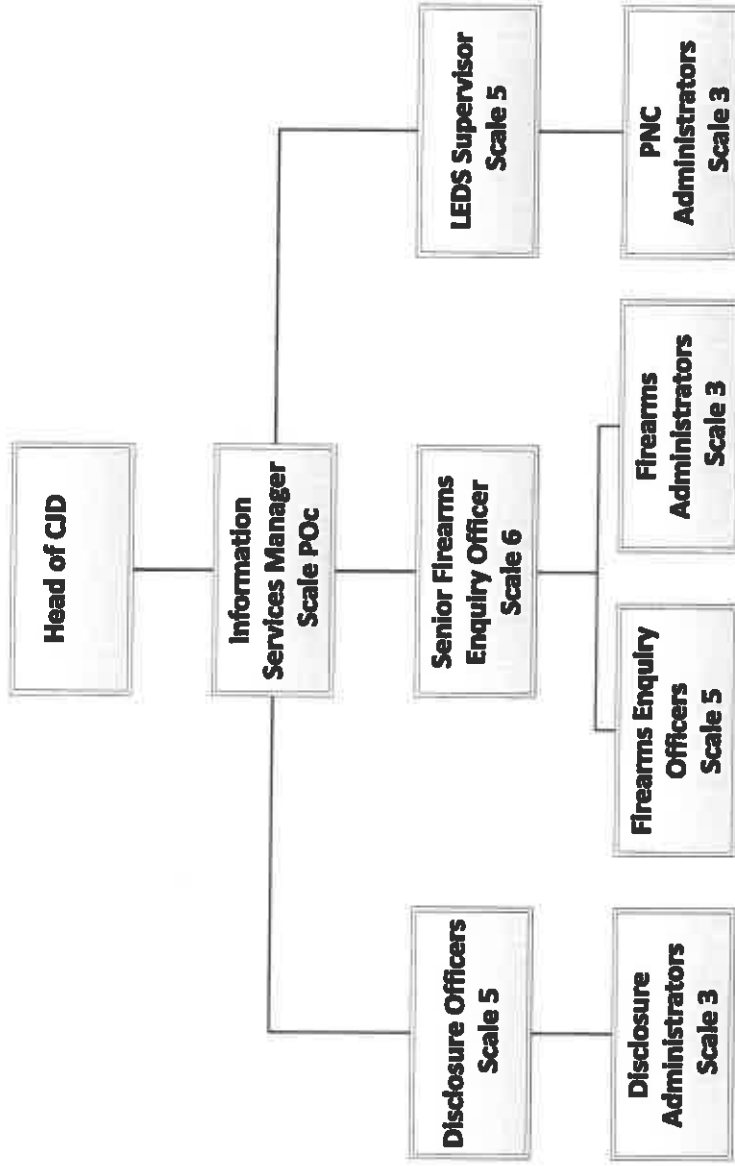
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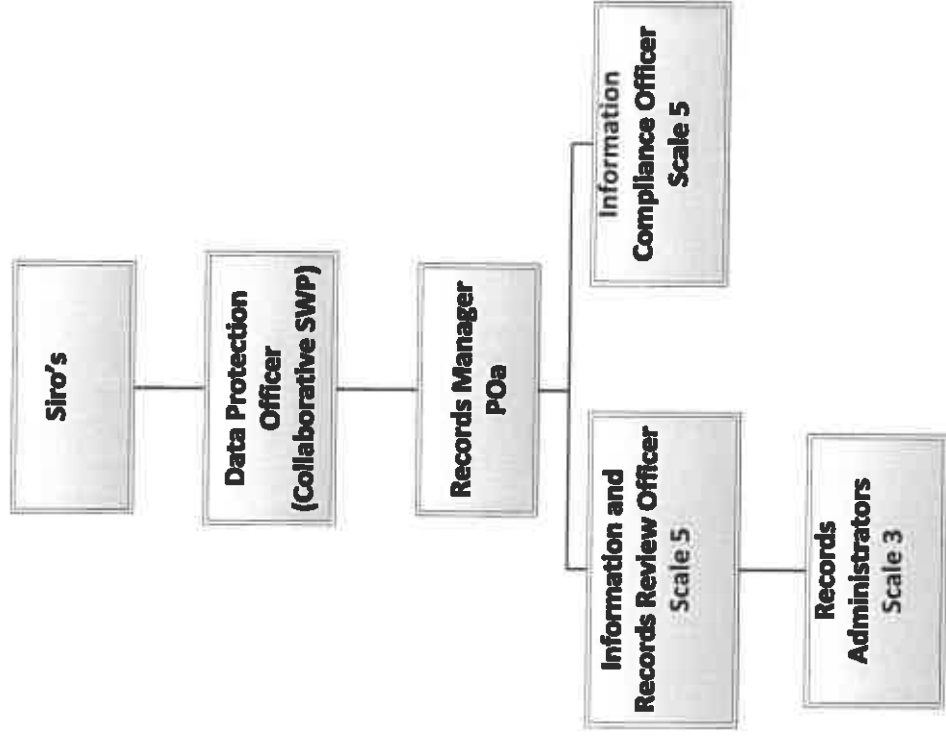
Information Management Structure

October 2018

Transactions



Information Governance



VOLUME & COMPLIANCE (%)

1 June 2018 to 31 March 2019

Disclosure Type	Performance Indicator	June	July	August	September	October	November	December	January	February	March
Subject Access Requests FOI	One calendar month	22 (100%)	25 (96%)	22 (95%)	16 (100)	22 (100%)	23 (100%)	8 (100%)	21 (89%)	18 (100%)	19 (100%)
		71 (90%)	107 (84%)	98 (90%)	90 (93%)	114 (79%)	89 (96%)	56 (91%)	133 (97%)	102 (100%)	105 (94%)
CAF/CASS	Stage 1: 5 wkg days Stage 1/2/2a: 10 wkg days Stage 2b: 15 wkg days	86 (100%)	53 (100%)	36 (100%)	31 (100%)	95 (100%)	41 (100%)	45 (100%)	67 (100%)	62 (100%)	67 (100%)
		41 (90%)	21 (100%)	50	43	133 (42%)	56	77	89	92	44
RTIC Disclosure CICA	20 days 30 & 60 days	48 (100%)	54 (100%)	60 (100%)	45 (100 %)	57 (100%)	49 (100%)	34 (100%)	60 (100%)	49 (100%)	44 (100%)
		55 (100%)	52 (100%)	55 (98%)	48 (100 %)	50 (98%)	51 (100 %)	38 (100%)	60 (100%)	56 (100%)	61 (100%)
Court Orders Data Protection (S29/S35)	10 days No specific time	2	14	18	9	5	12	6	0	8	9
		8	0	1	1	4	2	3	7	3	3
Legal Aid CLPD Notifications	No specific time	43	59	68	51	62	49	46	47	32	40
		10	14	2	0	10	0	30	6	5	1
CLPD Disclosures	No specific time										

INFORMATION COMPLIANCE - DATA BREACH DASHBOARD

March 2019

❖ Since 25th May 2018, there have been:

- 30 Serious Breach incidents reported at Gwent police
- 23 reported in 2018
- 7 reported so far in 2019

❖ In line with the Serious Breach Impact Assessment, incidents were graded as follows:

- GREEN = 8 (Impact on data subject is minimal)
- AMBER = 16 (Subject suffers some damage or distress)
- RED = 2 (Impact on data subject is significant)
- No Breach = 4

❖ Of the 26 incidents where a breach had occurred:

- 24 (92%) involved personal data that had been compromised whilst conducting official duties
- 2 (8%) related to security breaches whereby items containing sensitive information had been misplaced

File classification: SWYDDOGOL-DIM ANGEN MARC OFFICIAL - NO MARKING

The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

ICO Notifications:

Breaches reported to the ICO May 2018 – December 2018	6	All assessed by the ICO and closed with suitable advice
Breaches reported to the ICO January 2019 – 31 March	0	-

ICO Complaints:

Complaints received from ICO May 2018 – December 2018	3	All assessed and closed following suitable action
Complaints received from ICO January 2019 – 31 March	1	Assessed and not upheld.

ICO Self Referral:

Referral submitted to ICO May 2018 – December 2018	0	n/a
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Referral submitted to ICO January 2019 – 31 March	1	ICO will action upon receipt of complaint from data subject
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Information Governance Actions:

1	Targeted data protection awareness sessions where multiple incidents occur	Active and ongoing
2	Continuous monitoring of NCalt Managing Information module	Active and ongoing
3	Initiate annual refresher training of NCalt Managing Information module	Commence May 2019
4	Continuous monitoring of Data Breaches to ensure effective and timely reporting to ICO	Active and ongoing
5	Joint working initiative with North Wales Police to collate national data breach statistical information	Active and ongoing

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