

Detailed findings and action plan

Action plan and progress

Recommendation	Progress at 30 November 2014
A2. Appoint a formal records manager role to take on the operational responsibility for the development and implementation of the records management function	COMPLETED The Information Systems Manager was given responsibility of corporate records management
A3. Formalise the records management sub group, draft TOR and assign responsibilities to representatives to support the records manager in developing and implementing the records management function, strategy and policy. The group should meet regularly and attendance should be mandatory for members or their deputies.	COMPLETED/IN PROGRESS A records management project group has been formed and is chaired by the Information Systems Manager. This group consists of staff from a variety of Services across the Council.
A4, A5, A6. Develop an overarching policy that documents GBC's approach to records management, supports the RM function and provides a framework for supporting documents such as procedures and disposal schedules.	IN PROGRESS – COMPLETION TARGET: 31 March 2015 The Records Management Standards have been drafted and will be reviewed by the records management project group at the next meeting in January. This document will set out the Standards for the Council overall, and will be used by each Service to create their own set of local standards, based on their own needs. That target date for CMT approval of the standards

	is 31 March 2015. Therefore the records management actions shown in this table as "in progress" are expected to be completed by 31 March 2015
A7. Ensure that appropriate data protection training is completed by all staff processing personal data prior to allowing them access to systems.	<p>COMPLETED/ONGOING</p> <p>HR and Information Rights Officer agreed induction checklist to ensure local data protection compliance is covered by the managers of new starters.</p> <p>New staff are required to attend Information Rights Officer's corporate data protection training course within 3 months of starting.</p>
A8. Monitor training provision and completion in order to identify gaps and chase up non-attendance.	<p>COMPLETED/ONGOING</p> <p>Information Rights Officer initially keeps a spreadsheet record of training attendance matched against structure spreadsheets. This will soon be incorporated into Selima to ensure non-attendance is monitored.</p>
A10. Ensure the provision of data protection refresher training on an annual basis. Review training content on an annual basis so it remains relevant and up to date.	<p>COMPLETED/ONGOING</p> <p>At the time of writing, on line refresher training was being rolled out to staff who have attended training more than a year ago via NetConsent</p>
A11. Ensure there is appropriate records management training commensurate with	IN PROGRESS – COMPLETION TARGET: 31 MARCH 2015

<p>specialised staff duties. General records management requirements for all staff should be included in the corporate training.</p>	<p>The Records Management project group intend to roll out training on records management, following approval of the standards by 31 March 2015</p>
<p>A12. Review and formalise the local elements for training and monitor their deployment, ensuring they are consistent with corporate standards.</p>	<p>IN PROGRESS – COMPLETION TARGET 30 SEPTEMBER 2015</p> <p>Following approval of the standards by 31 March 2015, the Records Management project group will plan training on records management as part of the overall project during the period 1 April to September 2015. Training sessions for each Service will be included in this plan, based on their own local needs.</p>
<p>A13. Ensure that where staff require the use of Egress and Protective Marking that the training is completed.</p>	<p>COMPLETED/ONGOING</p> <p>Staff are now given the opportunity to cover Egress and protective marking in the corporate data protection training course.</p> <p>A “trail-finder” template has been circulated for officers to use if they intend to send an encrypted email via Egress.</p> <p>Further guidance and training will be required in respect of the latest Government Protective Marking scheme and preparation for this in underway</p>
<p>A14. Implement corporate minimum standards for the provision of fair processing information and review local standards to ensure they comply with</p>	<p>COMPLETED</p> <p>Fair Processing standards provided and available for officers on the Intranet and available through each officer’s NETconsent</p>

<p>these requirements.</p>	<p>portal.</p>
<p>A15. GBC should publish easily accessible corporate fair processing information on their website.</p>	<p>COMPLETED</p> <p>Fair processing notice is on our website at http://www.guildford.gov.uk/privacystatement</p>
<p>A18. Implement formal requirements to monitor and return records that are taken out of the office for extended periods.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION 30 SEPTEMBER 2015</p> <p>In order to meet the individual needs of each Service this will be completed at a local level, following the approval of the overall records management standards by 31 March 2015.</p>
<p>A20. Implement procedures to monitor the return of archive boxes.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION 30 SEPTEMBER 2015</p> <p>In order to meet the individual needs of each Service this will be completed at a local level by 30 September 2015, following the approval of the overall records management standards.</p>
<p>A21. Produce guidance for the archiving requirements to ensure records can be tracked and retrieved. Where records are of limited use for the purposes for which they were collected, consider whether they can be destroyed.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION 30 SEPTEMBER 2015</p> <p>As above – for completion during 1 April to 30 September 2015</p>

<p>A25. Consider separating data controllers, to reduce the risk of unauthorised access or disclosure of personal information.</p>	<p>This recommendation was under consideration at the time of writing.</p> <p>The data controllers are Guildford Borough Council, Surrey County Council and Surrey Police who share the Millmead complex. Information should not be shared between these separate legal entities in an ad-hoc manner.</p> <p>At the time of writing the Head of Business Systems was arranging a meeting with representatives from each of the data controllers to agree some ground rules in terms of maintaining confidentiality where necessary and to consider any other arrangements to ensure an appropriate separation of duties in respect of personal information.</p>
<p>A26. Reduce the access to the public by implementing the plan for a single central reception.</p>	<p>COMPLETED</p> <p>The Planning reception is now on the ground floor and this addresses the concerns raised by the inspectors, as the public are not required to go beyond the reception areas on the ground floor.</p>
<p>A28. Ensure that staff have a secure area to store documents, to prevent them from being left on desks or in in-trays.</p>	<p>COMPLETED</p>
<p>A31. Ensure that PDF files can be protectively marked in line with the requirements, or introduce an alternative measure for dealing with PDF files and</p>	<p>COMPLETED/IN PROGRESS</p> <p>The Boldon James File Classifier product has now been purchased and will be made available for all users by 28</p>

<p>train staff appropriately. For example, the use of safe haven procedures for fax usage.</p>	<p>February 2015. This product uses the same classification policy as the Office Classifier product, which is currently in use by staff at the Council.</p>
<p>A33. Ensure that all services develop and implement retention schedules for their manual records.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION 31 MARCH 2015</p> <p>The new Records Retention and Disposal Schedule has been drafted. This will be submitted for CMT approval with the Records Management Standards by 31 March 2015.</p>
<p>A34. Implement retention schedules for electronic records that are held by GBC. Ensure that schedules are reviewed regularly so they continue to meet business needs and statutory requirements.</p>	<p>See above (this is part of the Records Retention Schedule)</p>
<p>A36. Ensure that confidential waste is locked away at the end of the day to prevent any inappropriate access.</p>	<p>COMPLETED –</p> <p>Secure confidential waste storage provided in each office area</p>
<p>A37. Ensure appropriate RM performance measures are developed and that records management compliance reporting is fed into the relevant group / individuals.</p>	<p>IN PROGRESS – TARGET DATE FOR COMPLETION 31 MARCH 2015</p> <p>Overarching performance measures have been discussed by the Information Risk Group and will be incorporated into the Records Management Standards</p>

<p>A38. Where elements of existing policy contain records management requirements, these should be monitored and reported on to assure compliance.</p>	<p>IN PROGRESS – TARGET DATE FOR COMPLETION 31 MARCH 2015</p> <p>This forms part of the Records Management Standards due for completion by 31 March 2015</p>
<p>A40. Consider adapting the SIA to incorporate elements of records management.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION 15 APRIL 2015</p> <p>The ICT developers are building a Configuration Management Development Database (CMDB) that will hold information asset information linked to risk assessments, working procedures and controls. This is scheduled for completion by early April 2015.</p>
<p>A43. Include risks from local information asset registers within the corporate risk register where appropriate.</p>	<p>See above (A40)</p>
<p>A44. Where risk to information assets are identified as requiring a control, ensure these are recorded on the information asset register</p>	<p>See above (A40)</p>
<p>A45. Ensure that all information assets are assessed for risk. Where the workload is excessive consider allocating responsibility to additional staff.</p>	<p>COMPLETED/ONGOING</p> <p>This is now a standing agenda item on the quarterly P&ISL meeting. New systems are risk assessed during the approval process by ICT and the Information Right Officer together with the relevant project manager.</p>
<p>A46. Ensure there is oversight of</p>	<p>COMPLETE/ONGOING</p>

<p>information asset risks and that any controls are tested for adequacy.</p>	<p>This is a training and awareness issue. This is raised at the Corporate Data Protection training and included as a standing agenda item on Information Risk Group agenda and P&ISL Group</p>
<p>A49. Ensure the requirements for conducting Privacy Impact Assessments (PIAs) are published and available to staff. These should highlight when a PIA is required, include compliance requirements, detail the authorisation process and outline monitoring / recording measures.</p>	<p>COMPLETED</p> <p>The PIA template is available on the Intranet for officers and has been incorporated as part of the VERTO project management process.</p> <p>Also bespoke PIAs provided in relation to:</p> <ul style="list-style-type: none"> • Press releases • CCTV • Staff monitoring and report information (via Acceptable Use Policy)
<p>B4. Additional resource should be provided to support and cover leave or other absence of the Information Rights Officer.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION: 31 MARCH 2015</p> <p>A Management Briefing note is due before CMT during early January to propose the arrangements for meeting this recommendation. The recommendations from this report are due to be implemented by 31 March 2014.</p>
<p>B5. SAR monitoring information should be provided to the PISL Group. Any information request failing to meet legal time limits should be reviewed by PISL,</p>	<p>COMPLETED</p> <p>This is now a regular agenda item on the P&ISL Group meetings.</p>

<p>causes identified and results reported to the Information Risk Group.</p>	
<p>B14. Links should be added to the current pages to provide appropriate guidance on the use of redaction and exemptions in relation to requests for personal data.</p>	<p>COMPLETED/IN PROGRESS</p> <p>FAQs guidance added to our SAR system.</p> <p>ADOBE Pro licences (for redaction) have been purchased and available to service representatives together with on the job support as required</p>
<p>B15. GBC should implement the use of KPI's regarding the processing of Subject Access Requests (SARs) in line with the Subject Access Request Procedure.</p>	<p>COMPLETED</p> <p>Timescales for completion are now monitored</p>
<p>B16. GBC should ensure services have delegated responsibility for ensuring the appropriate progress of SAR processing and for monitoring and reporting this to the Information Rights Officer.</p>	<p>IN PROGRESS – TARGET FOR COMPLETION 31 MARCH 2015</p> <p>As for B4, the briefing note will address arrangements for SARs and FOI requests. CMT agreement will be required.</p> <p>A FIRMSTEP FOI Add-on has been installed and will be configured following CMT agreement of the briefing note. This will replace the current FOI and SAR system and is expected to be fully operational by 31 March 2014</p>
<p>B18. The proposed SAR training should be rolled out as a priority to those teams responsible for dealing with the majority</p>	<p>COMPLETED/ONGOING</p> <p>Class-based training sessions provided and will become part of</p>

<p>of requests, for example the Licencing Team.</p>	<p>the regular corporate training plan. Now available twice-yearly.</p>
<p>B19. Redaction and exemption training should be provided to relevant staff as required.</p>	<p>COMPLETED/ONGOING</p> <p>Included in training for B18 - Class-based training sessions provided and will become part of the regular corporate training plan.</p> <p>IRO also provides specific advice to staff as and when required (ongoing)</p>
<p>B21. Introduction of a work flow based system with facilities such as automatic email reminders should be prioritised to reflect the problem of late SAR completion.</p>	<p>SEE B16</p>
<p>B33. GBC should ensure that the proposed replacement for the Subject Access Request System can retain central records of all 3rd Party disclosure requests.</p>	<p>SEE B16</p>