Annual Information & Data Management (IDM) Report for 2022/23

1 April 2022 – 31 March 2023

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Contents

1 Purpose of the report

This is the first report of this nature prepared for Waverley Borough Council (WBC), marking the beginning of a new chapter with the strong recognition that information and data is one of our key corporate assets, with the aim of ensuring robust governance and active management practices are in place. The purpose of this report is to reflect the journey taken in 2022/23 to improve our information and data management (IDM) practices across the organisation and inform about the next planned steps.

2 Executive Summary for 2022/23

2.1 Senior Information Risk Owner (SIRO) Summary

The delivery of services to our communities and local businesses is reliant on collection and processing of a wide range of data. We need our residents' information to provide bin collection service or enable council tax and benefits claims to be processed, respond to tenant's home-repair request cases and so much more. We also analyse data from different types of transactions or service delivery to monitor our performance, to help us gain invaluable insight and contribute to clear decision making.

With the everchanging world of technology and to help us satisfy our customers' expectation for digitally accessible services, ongoing improvements to our information and data management practices are a necessary part of our operations. The senior management team feels very strongly about supporting the efforts to empower our staff and councillors in growth of their data and digital skills to perform their roles effectively.

The details about the progress made in 2022-23 can be found in following sections:
- Information and Data Management Programme (IDMP)
- Cyber Security
- Data Protection
- Freedom of Information (FOI)
- Data Transparency & Open-Source Data

I would like to express my gratitude to all colleagues who have contributed to this report and for the work carried out throughout the organisation to promote best use of information and data.

Ian Doyle *(SIRO), Joint Strategic Director (Transformation and Governance)*

2.2 Portfolio Holders Statement

The Executive welcomes and supports the steps taken by the organisation to improve information and data management practices. In times of funding cuts and many challenges faced by communities in our borough, as well as changes in customer demand, successful service delivery is dependent on data-driven, evidence-based decision making to support innovation and to help streamline our processes.

Cllr Peter Clark, *Deputy Leader & Portfolio Holder for Customer Services, Business Transformation and IT*

Cllr Victoria Kiehl, *Portfolio Holder for Organisational Development and Governance*

3   Information & Data Management (IDM) Framework

3.1   Framework Foundations

In 2022 after an internal review, the senior management team has recognised that a more robust approach to Information & Data Management was required to enable digital transformation and promote effective use of data in day-to-day service delivery and decision making.

Whilst there appeared to be good practice already in place in many areas, there was no overarching custodian linking efforts across the Council. The corporate post of Information Manager was created in June 2022 to achieve this.

Since July 2022, Waverley started to use the principles recommended by globally recognised Data Management Association (DAMA UK) as a basis for the framework. This holistic approach to Information and Data Management is rooted in recognition that good practices need to be embedded throughout all data management functions, with everyone understanding their specific roles and responsibilities.

As a public authority the council considers the latest advice from Information Commissioner's Office (ICO) and impact of governmental initiatives such as for example the National Data Strategy - GOV.UK (www.gov.uk).

3.2   Using DAMA principles

There are eleven Information and Data management functions, with each having its own specific governance requirements.

DAMA-DMBOK2 Data Management Framework, broken down per data management functions (also known as DAMA wheel)

These functions do not directly represent a single team structure but are more indicative of certain themes / aspects that need to be considered for a holistic approach to data management.
How does this work in practice in our organisation? Some of the themes are very technical and

are looked after by our IT team or external software providers, others relate to corporate initiatives such as implementation of our Master Data Management (MDM) Platform and integration with back-office systems, where multiple cross-service teams get involved. Others are specific to how teams manage their data (such as data quality checks, where to store and how to classify our documents and official records). Not all aspects can be tackled at once and the 'Information and Data Management Programme' has been put in place to target specific workstreams every year until we achieve a desired level of maturity in our practices, when the programme will become part of business-as-usual operations (with the information and data management improvement initiatives being informed by the organisational needs at the time).

3.3 Governance arrangements

Although various internal groups and boards have worked in the past on improvements to our information and data management (IDM) practices, the GDPR preparation project has brought to the fore the need to establish a much stronger governance for this area. In November 2017, the Information Governance Board (setting the strategic direction) and the Information Governance Group (working on delivery of the actions) were established and met on regular basis to carry out their duties. As the needs of the organisation have changed in the past five years, the officers are currently reviewing our governing arrangements with the view to improving the alignment between Data related matter with the IT & Digital Transformation due to a close link between these functions in operational objectives delivery. The governing arrangements will be supported by strategic and operational roles.

3.4 Strategic roles

Although everyone (staff and councillors) has certain responsibilities with relation to our information and data management, the organisation has a handful of officers working on setting a long-term vision for the organisation with clear guidelines on practices, supported by staff training and communications. The Governing structure including strategic roles have been illustrated in the below infographic.
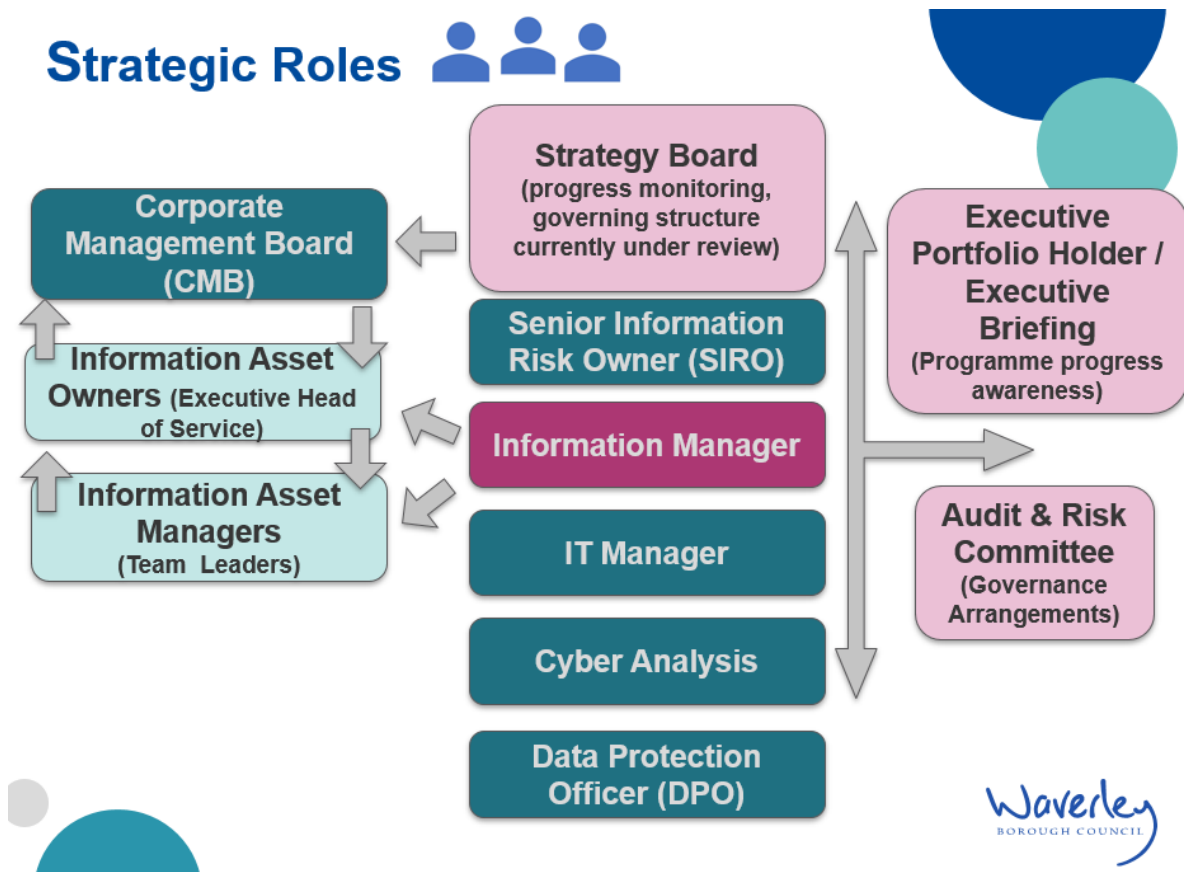
3.5 Operational roles

The focus of the operational roles is on actively managing data in their care. The infographic below illustrates how different data roles operate within a typical data lifecycle. It is worth noting, that although major software system administrator roles are frequently a full-time post, for all other roles management of data run alongside other tasks expected from the postholders.
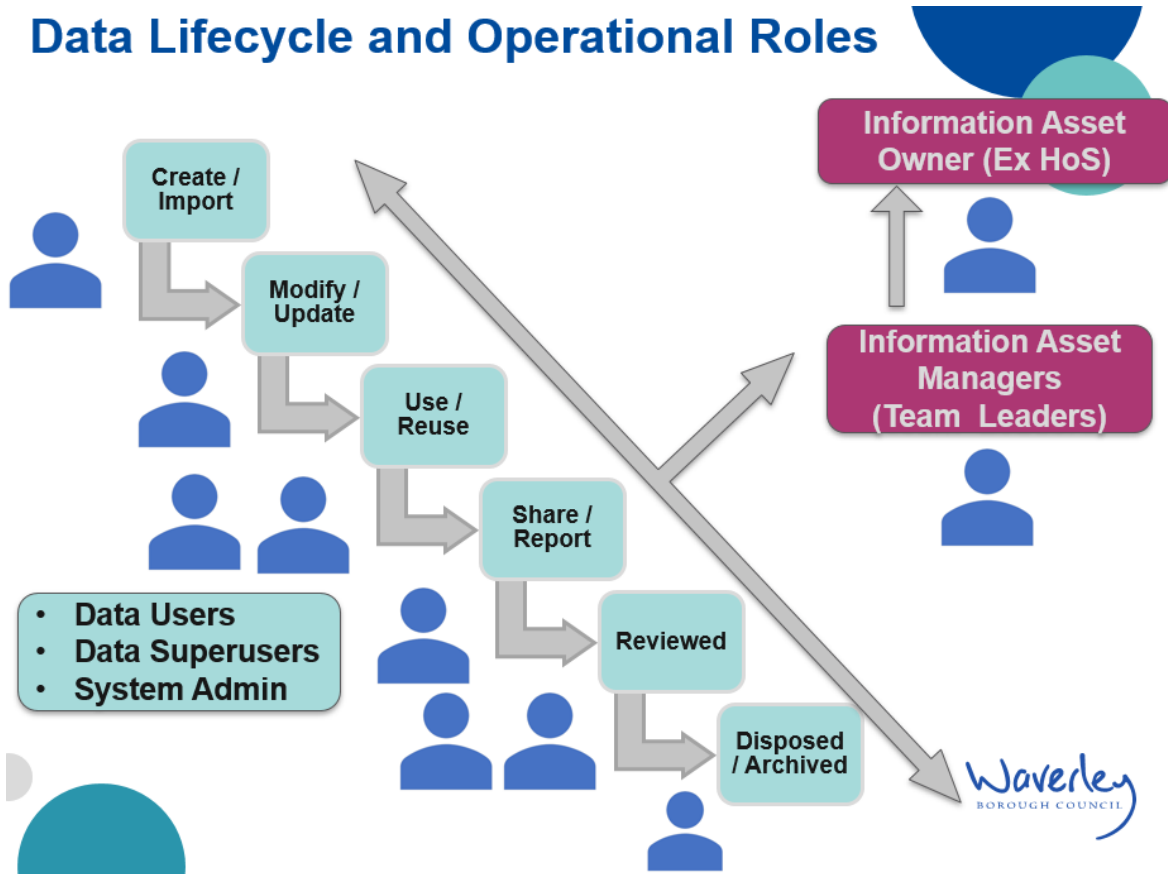
A dedicated SharePoint page has been created explaining in details responsibilities of all the roles, however more work needs to be done with the teams to embed the practices.

3.6 Policies and Procedures

The policies and procedures that guide staff in best practices are as follows:
- Information & Data Management Policy – internal publication
- Records Retention Schedule – external publication
- Data Protection Policy – external publication
- Consent Policy– external publication
- Data Breach procedure – internal publication

4   Annual statement for officer-resourced functions

4.1   Information and Data management Programme (IDMP)

4.1.1   About the function

As the organisation began establishing stronger information and data management (IDM) practices, a dedicated Information and Data Management Programme (IDMP) was developed in July 2022, led by the Information Manager. The aim of the programme is to provide a robust framework and a clear road map to achieve the desired level of maturity in our practices and link up with functions across the organisation. The pilot to assess the current maturity level has commenced and findings will be reported to the Audit and Risk Committee in due course.

IDMP Vision and Mission

The programme was defined using the VMOSA model (Vision, Mission, Objectives, Strategies, Action). The vision statement and mission focus areas have been included in the infographic below. The long-term objectives and strategies are still being developed, with progress monitored through the annual action plan.


4.1.2   2022-23 Reflection

The first year of creating and introducing the programme had, not unexpectedly, some challenges, for example embedding a theoretical framework in a real-life context, agreeing action prioritisation, considering resource constraints and the size of the task at hand. The formation of the Joint Management Team for both Waverley and Guildford Councils has

affected the stakeholder engagement process due to other pressing priorities needing to be addressed in the initial months. More work will be done in the coming year with the senior management and wider organisation with targeted workshops and regular communications to bring everyone along on this process improvement journey.

Key initiatives undertaken were:
- Development of the programme's VMOSA model (operating framework)
- Meetings with a range of officers across the organisation to understand most pressing issues and then prioritise accordingly – the action plan for 2023-24 reflects these findings
- Carried out open to all-staff briefing sessions about the programme and the work that awaits us as an organisation – starting with a need to first understand the data, as per the below infographic:
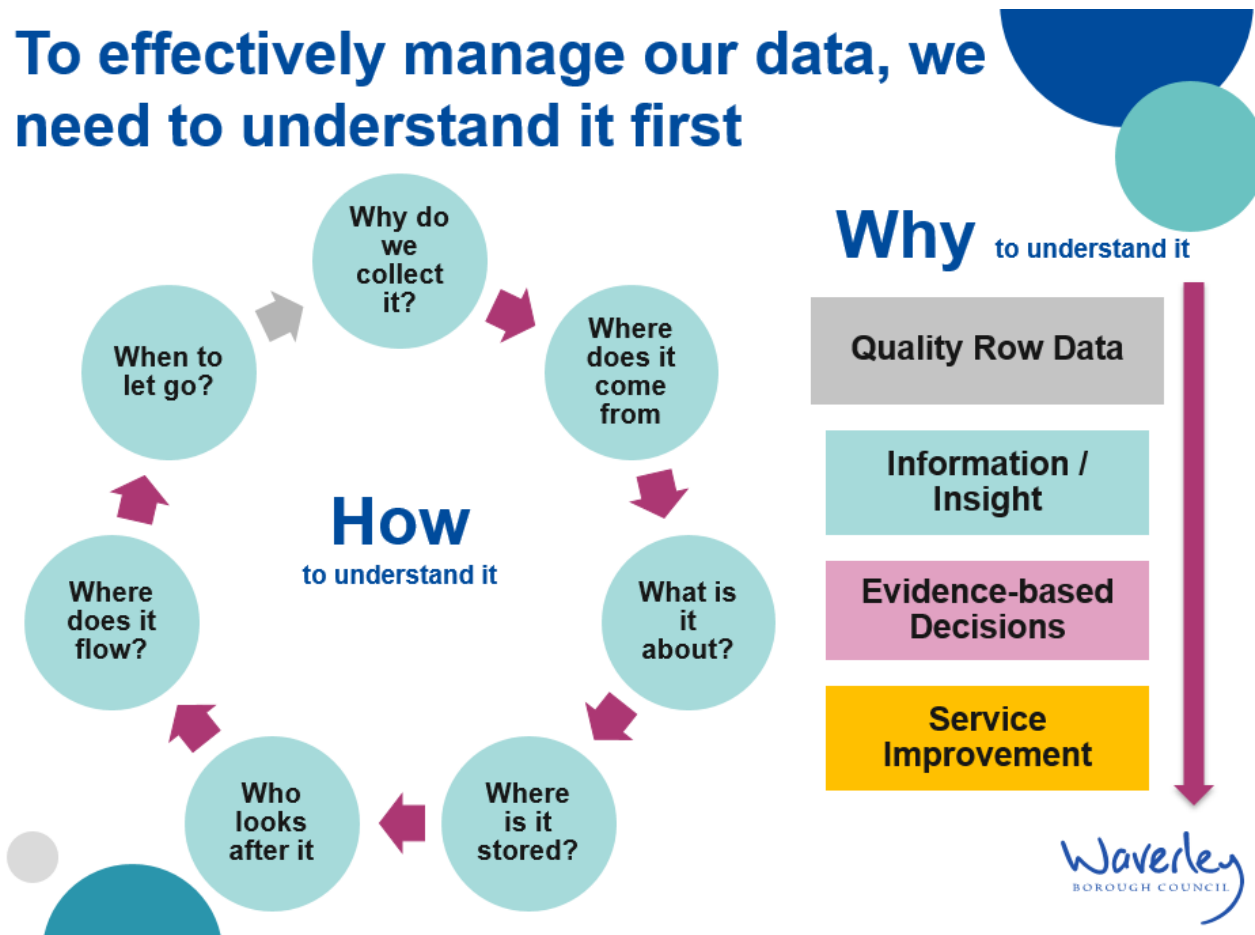
- Updating of the Systems List to understand where data is stored for each service area
- Collaboration with the Internal Audit Team to conduct a pilot of Data Management Maturity Assessment with five teams – the results are currently being analysed
- Collaborating with the Street Naming Team to promote use of golden address record (LLPG and UPRN) in their daily operations, improving data quality. Successful pilots have completed with Housing and Elections Teams, and the work with other teams will continue in 2023-24
- Development and roll out to staff of 'Surveys and Data Processing' SharePoint resources and delivering of training session on the new processes
- Supporting teams in their legacy system modernisation plans
- Collaboration with the DPO on developing the Information & Data Sharing Agreement template which needs to be rolled out to the organisation in 2023-24

4.1.3 2023-24 Planned focus and improvement work

The focus of the programme for the coming year is delivery of five key workstreams, complemented by smaller initiatives, time permitting.

- **Workstream 1** – **Framework Development** (embedding the governance arrangement and data roles, development of further training materials and sessions, guidelines and checklists for effective practices, regular communications and awareness campaigns) – Status: In progress
- **Workstream 2** – **Data Management Practices Maturity Assessment** (Following the pilot with five teams, continue liaising with the remaining teams (there are over 40 teams at the council split into 12 service areas) on creating improvement plans based on their current data management maturity level) – Status: In progress
- **Workstream 3** – **Development of a Data Classification Scheme** (Using the Local Government Functional Classification Scheme (irms.org.uk) and existing classification models in Civica Electronic Document Management Systems (EDMS) and SharePoint to develop a corporate Data Classification Scheme enabling consistent document labelling and categorisation facilitating easier search functions and systematic disposal using automation) – Status: Discovery Phase begun – need to consider Microsoft Teams Environment as a future window to SharePoint and decide on appropriate content creation rules
- **Workstream 4 – Document & Content Management** (Development of a SharePoint page for new starter induction and resource for existing staff regarding data storage, and what systems are recommended for different activity types, councillors needs to be also considered) – Status: The page is close to completion but needs to be rolled out to staff and included in the IT Induction Training
- **Workstream 5 – Development of a Modernisation Plan for Legacy Systems** (Collaboration with the IT team and services to ensure data is stored in safe and efficient systems) – Status: In progress

4.1.4 Information Risk Management

Although service level risks are managed by the teams locally, development of a standalone subject-specific Information Risk Register would support an effective escalation process, and guide prioritisation of information and data improvement initiatives. The Information Manager will liaise with all identified stakeholders (IAO, IAM, DPO, Cyber Analyst, IT Manager and Senior Management team) to develop a document and establish the monitoring process.

4.2 Cyber Security

4.2.1 About the function

The council has a dedicated Cyber Analyst, responsible for instilling best practice in technology use and working practices to protect our information assets.

Pursuing the theory of layered protection, independent solutions have been implemented at various areas of the infrastructure, to protecting assets and data from malicious interception. This can be both pro-active and reactive and involves ongoing hardening of hardware and software; creating and responding to automatic alerts; and investigating and implementing new technologies to improve defensive capabilities.

It is imperative to spread awareness of cyber security throughout the organisation, researching and implementing training, responding to requests for advice and assisting in identifying malicious behaviour, or reacting to social engineering attempts.

The council currently works towards Public Services Network (PSN) compliance and

certification, but will investigate adoption of the Cyber Assessment Framework for Local Government when PSN moves to end-of-life (when this is declared by the Department for Work and Pensions DWP). The objectives outlined in the framework concentrate on addressing risk, protecting against attack, detecting cyber events, and minimising the impact of incidents.

The National Cyber Security Centre (NCSC) supports the council by providing assistance and advice in the case of incident, and also a set of monitoring tools to help protect Domain Name System (DNS), detect vulnerabilities in council web services, and also provides live detection and advice on the security technologies lying behind email services.

4.2.2 2022-23 Reflection

A lot of work has been carried out in the last year to ensure potential risk areas are proactively investigated, and to equip staff with the knowledge and improvements in practices where appropriate. For obvious reasons the full details of these activities cannot be disclosed in this report.

Resources for Staff

A dedicated intranet page has been created linking to the latest news and awareness campaigns, and multiple communication channels are used to reach colleagues.

Staff Awareness Communications Campaigns Completed

- March 2022 - Case study - Phishing Email
- March 2022 - NCSC Security Tips on Phishing
- March 2022 – Social Engineering Explained
- May 2022 – Cyber Security: Mandatory Training
- July 2022 – Phishing Scam Warning
- September 2022 – NCSC: Phishing Warning
- November 2022 – Beware of the scams over the holiday period.
- April 2023 – Phishing Emails

Mandatory training

Mandatory cyber security training has been implemented for all staff with a WBC corporate logon account. There is a dedicated in-house IT trainer whom staff can approach for advice and training as well as the wider IT infrastructure team for advice, training or to raise concerns or suspicions. A culture of vigilance and awareness is either enforced, encouraged and/or facilitated where appropriate.

Statistics

Email

For illustration purpose in a typical one-month period in 2022 there were a total of 488,963 emails received, of which 59,743 were rejected for the reasons below. This amounted to a 12% rejection rate. The most frequent reason for blocking was the geographic location of the sender (RBL).

Email Rejection Reasons	Monthly Instances Count	Proportion of total rejections
Sender Location Found in Geographic RBL	33,736	56.47%
Sender failed to retry	6,489	10.86%
Invalid Recipients Address	5,832	9.76%
Anti-Spoofing Lockout	4,891	8.19%
IP Found in RBL	4,746	7.94%
Manual Envelop Rejection	1,607	2.69%

Email Rejection Reasons	Monthly Instances Count	Proportion of total rejections
Manual Header Rejection	1,304	2.18%
Spam Signature Detection	595	1.00%
Envelope Rejected	262	0.44%
Anti-Spoofing Header Lockout	216	0.36%
Virus Signature Detection	65	0.11%
Total Instance Count	**59,743**	**100%**

Websites

Over a typical one-month period across selections of our website, a number of attacks were blocked, as an example of volume for June 2023 this represents 131,740 events in total.

New acquisitions

Several new security systems were implemented within this report timeline which have been configured and now actively complement or augment security practices.

By nature, some technologies adopted can be experimental. Numerous hours and resources were invested to implement a specific system ultimately dropped by developers requiring a roll-back. This will subsequently trigger a search for a replacement solution which will take place in 2023-24.

4.2.3   2023-24 Focus or improvement work planned.

Work to improve staff training and awareness will take place in the 2023-24 to address the published research of degradation of training retention in this subject area over time. The focus will be on adopting more modern approaches and providing short and frequent information sessions to improve results in this area.

Research is ongoing (Cyber Analyst in conjunction with NCSC), investigating new technologies to protect council systems and work is always being undertaken to harden and upgrade both software and hardware, applying manufacturer and supplier security patches and configuration recommendations.

4.3   Data Protection

4.3.1   About the function

The Council has a dedicated Data Protection Officer (DPO) responsible for ensuring compliance with the Data Protection Act 2018 (which is the UK's implementation of the European Union's General Data Protection Regulation (GDPR), and controls how personal information is used by organisations, businesses and government). We also follow the latest guidelines set by the Information Commissioner's Office (ICO). The role manages Subject Access Requests (SARs) by individuals and supports activities such as preparation of privacy notices and statements, data sharing agreements, as well as carrying out the ongoing review of the Council's Records Retention Schedule.

4.3.2   2022-23 Reflection

Subject Access Requests (SARs)

The 'Right of Access', introduced through GDPR and Data Protection Act 2018, gives individuals the opportunity to: ask organisations how their data is being used; let them ask why their data is being used in a certain way; ask that their data be corrected, and request that data processing be stopped. The vast majority of SARs, however, are submitted with the intention

of using the information provided to either try and build a case against the Council, or in relation to a neighbour dispute in the hope of finding out what a third party might have said about them. WBC are not allowed to challenge the motivation for a request, other than to redact or completely withhold third party data in any response (which is explained to the requestor).

Whilst the numbers can fluctuate, overall, there has been a steady increase in the number of these requests received. The response time from services, when asked to obtain the requested data, overall, is good. We have not experienced any challenges to the data provided and there have not been any cases referred to internal review, or the ICO.

You can learn more about how to make a subject access by visiting our website Waverley Borough Council - Subject Access Request - how to submit a SAR.

Data Breach Statistics

Totals received since records began towards the end of 2018:

2018 - Sept – Dec: 25
2019 – 90
2020 – 76
2021 – 58
2022 – 39
2023 – Jan to May - 20

Only one was reported to the ICO and that was in Sept 2018. The ICO took no action against WBC and accepted assurances about how the complaint had been handled.

Privacy Notices & Privacy Statements

We aim to be very clear with residents, businesses, suppliers and partners) on how we handle the data in our care, and for that purpose the organisation has put in place an overarching Waverley Borough Council - Main council privacy notice. As we provide a wide range of services which differ in terms of the type of data collected and how it is processed. Where appropriate, we have created Service specific privacy notices which are more detailed and specific to the functions performed.

As many of customer interactions will involve collection of data, we also use privacy statements (small disclaimers about use, retention and sharing), to inform customers about the purpose of collection. A 'Privacy Notice and Privacy Statement' dedicated intranet page has been created as a resource for staff.

Data Sharing Agreements

The council has developed a refreshed 'Information and Data Sharing Agreement' template which will be used as part of procurement documentation suite. A communication campaign and training workshops are planned to help embed the practice.

Communications

The DPO issues all-staff emails at the start of every month. The emails contain basic details of the previous month's breaches, reminders about support material available on Backstage (staff SharePoint intranet) and also any recent data protection related news items the DPO thinks will be of interest and use. The other purpose of the email is to help keep the topic of data protection alive in colleagues' consciousness. It's a process which appears to work – the DPO is often asked for advice about specific data protection matters related to colleagues' work and breaches appear to be promptly reported because colleagues understand that there will be no

recrimination – just the need to learn from cases, where possible.

Training

The DPO liaises with the Learning and Development Team, which is part of Human Resources, to ensure annual Data Protection refresher training is undertaken as a mandatory requirement. There is a process to ensure new starters are given DP training as soon as they join. There is support material on the DP hub and reminders about these are provided in the all-staff emails. Recently the DPO issued a questionnaire asking colleagues to rate various categories of data protection matters and this will inform the development and priority of training over the coming months.

4.3.3 2023-24 Focus or improvement work planned

In addition to the training referred to, work has started on updating the breach procedure. A SAR and FOI procedure will be developed this year. Also, this year it is hoped we will be able to review the Retention Schedule and ROPA (Records of Processing Activities). Staff awareness campaign and training will also be carried out to embed good practices for information and data sharing. The new Data Protection and Digital Information Bill is being taken through Parliament and its progress will be monitored so we can understand what implications there might be for the Council's data protection obligations.

4.4 Freedom of Information (FOI)

4.4.1 About the function

To comply with the Freedom of Information (FOI) Act 2000 and the Environmental Information Regulations (EIR) 2004 (which give public rights to access information recorded and held by public authorities), the organisation has an Information Rights Coordinator (IRC) who manages responses across the organisation.

Further details about our FOI function can be found on our website Waverley Borough Council - Freedom of Information (FOI) and Environmental Information Requests (EIR). Frequent requests can be viewed on our website. Waverley Borough Council - publication scheme

4.4.2 2022-23 Reflection

A new FOI recording system has been created to assist with the timely processing of FOI requests. Early in 2023 an internal audit was carried out to review the functions of the FOI process. Several recommendations were made which the FOI Officer, with the assistance of other colleagues, has completed. These were reported via the Internal Audit function, however the main recommendations implemented are included here for completeness:

- Fully documented FOI procedures are in place.
- Changes to task allocation emails to ensure staff are aware of key timescales when they receive a request, such as third-party involvement and sensitivity of data.
- System filing has been reviewed and a process for filing and holding request documentation is now in place.

The performance monitoring of this function is subject of quarterly scrutiny by the Resources Overview and Scrutiny (O&S) Committee, and the latest statistics are included in the Q4 2022-23 Corporate Performance Report Annexe 1 - Final (waverley.gov.uk) on page 21 of the report.

There are two key performance indicators (KPIs) reviewed by the Resources O&S Committee:

- Number of Freedom of Information (FOI) and Environmental Information Regulations Requests (EIR) received in a quarter (Data only)

- Percentage of FOI and EIR requests responded to within the statutory timescale in a quarter (Target of 100% has been set) – this target is currently subject of a review

Past performance reports and FOI statistics can be found in the Resources O&S Committees past agenda papers in previous Corporate Performance Reports.

4.4.3 2023-24 Focus or improvement work planned

One of the main focuses for this area of work will be training of key councillors involved with the FOI process within service areas during 2023-24. The IRC, alongside the DPO and IT, will create a training course for staff involved in day-to-day requests and also for Senior Managers in relation to the Internal Review Process.
The FOI system is being developed further to improve functionality and performance.

4.5 Data Transparency & Open-Source Data

4.5.1 About the function

One of the tasks overseen by the Policy and Performance Officer is the coordination of data transparency publications, submitted by colleagues across the organisation, in accordance with the Local Government Transparency Code. The Council has created an internally-managed 'Data Transparency Publication Schedule', and reminders are sent to relevant officers alerting them to when they need to publish their files. The majority of uploads take place annually after the end year in April, but some financial data gets updated on a quarterly basis. Further details can be found on our website on Waverley Borough Council - Data transparency.

The Council participates in the Government's Open Data Scheme (data.gov.uk) allowing access to data published by central government, local authorities and public bodies.

4.5.2 2022-23 Reflection

Due to workload the annual upload task has not yet been completed, but it is expected that all publication for 2022-23 subject to the Data Transparency Code will be completed by the end of September 2023. All the latest published documentation can be found on our website at Waverley Borough Council - Data transparency.

4.5.3 2023-24 Focus or improvement work planned

The Policy and Performance Officer will be working with the teams to ensure publications are completed in a timely manner, sufficient resources have been allocated and officers trained to perform the required publication tasks.

The Information Manager will liaise colleagues to review current placement of the Data Transparency function to create stronger links to the FOI function, and also to establish a corporate approach to publications through the governmental Open Data Scheme (data.gov.uk), to support the teams who are currently using or would like to use this platform in the future to publish their data.

5 Glossary

- DPO – Data Protection Officer endure compliance with Data Protection Act and ICO guidelines
- EDMS - [Electronic Document Management Systems](#)
- Golden record - [A golden record](#) is a single source of truth, data point that provides all of the important information about a customer, client, or resource with total accuracy. For example, a golden record would provide correct address information, an email, a phone number, and more, all in a single data entry
- [Hardening process](#) – [What is systems hardening by BeyondTrust](#) *'Systems hardening is a collection of tools, techniques, and best practices to reduce vulnerability in technology applications, systems, infrastructure, firmware, and other areas. The goal of systems hardening is to reduce security risk by eliminating potential attack vectors and condensing the system's attack surface'*
- IAM – Information Asset Manager – at WBC typically Team Leader directly reporting to the Executive Head of Service. Responsible for ongoing management of information assets allocated to them, delegating the work to System Admins, Super users and Data Users. Ensures that effective data processing procedures are in place and all systems users know it well and adhere to it in their daily data processing practices. Organises necessary staff training sessions, data quality checks. Alerts IAO of any issues and risk that could compromise integrity and/or safety of the information/data asset and help to develop mitigation measures
- IAO – Information Asset Owner – at WBC typically an Executive Head of Service. Responsible for overseeing the management of Information Assets within their service and the work done by Information Asset Mangers. Owner of risks and mitigation actions for information assets. Ensures that the robust policies and appropriate resources have been put in place for efficient data and information management within their service area. Champion of data and information principles, training and knowledge sharing
- ICO – [Information Commissioner's Office](#)
- LLPG – [Local Land and Property Gazetteer](#) – Waverley as a local authority is a custodian for borough wide address data set ensuring best quality of data, this data set feeds into the National Gazetteer and is used by many other public sector organisations (police, ambulance, etc.) as well as private organisations such as Royal Mail
- NLPG – [National Land and Property Gazetteer](#)
- RBL – [Realtime blackhole list](#)
- [Social engineering](#)
- UPRN – [Unique Property Reference Number](#)