# Annual Information & Data Management (IDM) Report for 2023/24

## 1 April 2023 – 31 March 2024



**Version: Final report 6 June 2024**

**Lead Officer:** Nora Copping, Information Manager at Waverley Borough Council

# Contents

# Contents

# 1   Purpose of the report

In September 2023 the Audit & Risk Committee have approved the inclusion of this annual report (AUD26/23) as part of their ongoing work programme at June cycle of meetings ((2022-23 Annual IDM Report - Annexe 1 Final.pdf (waverley.gov.uk). This decision has marked the beginning of a new chapter with a strong recognition that information and data is one of our key corporate assets, and therefore we must ensure robust governance is put in place and active management practices are embedded throughout the organisation. The purpose of this report is to reflect the journey taken in 2023/24 to improve our information and data management (IDM) practices across the organisation and inform about the next planned steps.

# 2   Executive Summary for 2023/24

## 2.1   Senior Information Risk Owner (SIRO) Summary

The delivery of services to our communities and local businesses relies on the collection and processing of a wide range of data. For example, we need our residents' information to provide bin collection services, to process council tax and benefits claims, to respond to tenants' home-repair request cases. 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.

In a context of constantly changing and evolving technology where our customers' rightly expect digitally accessible services, ongoing improvements to our information and data management practices are a vital part of our operations.  We must empower our staff and councillors to grow their data and digital skills to perform their roles effectively.

The details about the progress made in 2023-24 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.

**Robin Taylor** *(interim SIRO), Joint Assistant Director, Organisational Development*

## 2.2   Portfolio Holders Statement

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. The Executive is very supportive of the steps taken by the organisation to improve information and data management practices

**Cllr George Murray**, *Executive Portfolio Holder for Customer Services and IT*

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

# 3 Information & Data Management (IDM) Framework

## 3.1 Background

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, and to lead Council's Information and Data Management Programme of improvement initiatives.

## 3.2 Framework Foundations

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 well as strong governance and clear channels of escalations.

### 3.2.1 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).

### 3.2.2  Other guidelines

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).

## 3.3  Governance arrangements

In December 2023 the senior management team agreed adoption of new governing structures combining all previous groups and boards related to IT, Information and Data, and also adding Digital aspect. This change is reflective of the needs within the organisation to consider these matters jointly for a more holistic. The service specific IDD Group (IT, Data & Digital) will be meeting three times a year in short cycles, escalating any areas of concern or decisions requiring corporate steer to the IDD Board. This initiative is in its first months of trial, but the first cycle of meetings (which took place in February and March 2024) has already brought a lot of valuable conversations and helped to identify areas of priority work.  The IDD groups membership consists of service representatives Information Assets Owner (Assistant Director for the service) and Information Asset Managers (Managers and Team Leaders), as well as System Administrators from the teams and the technical representatives from IT, Information & Data Management and Digital Team. There is still a lot of work to be done to establish the data roles within the service and this will be a focus for 2024-25.



**IDD Groups and Board**
*(IT, Data and Digital)*

## 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.
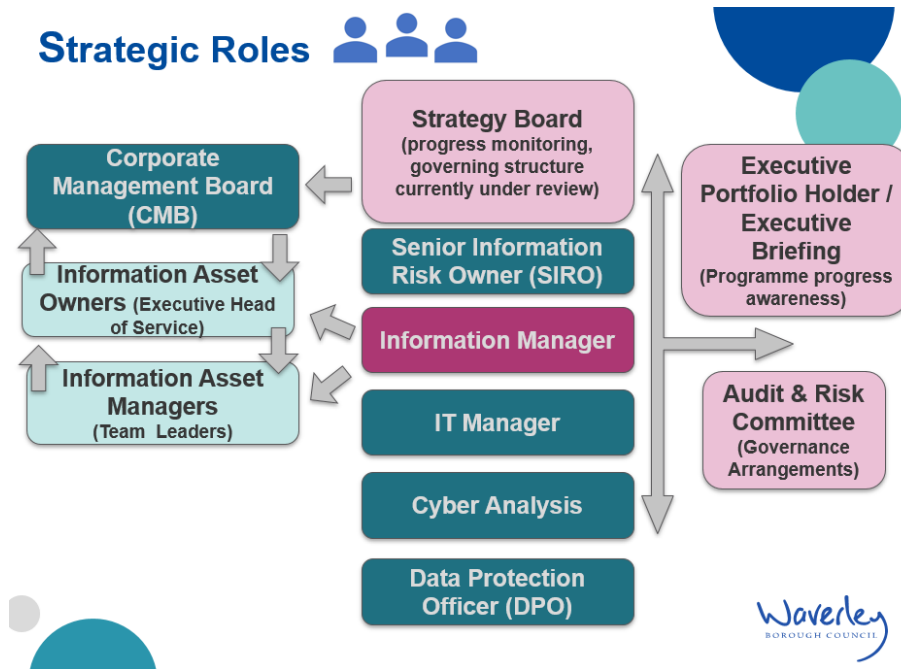


## 3.5  Operational roles

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 the management of data runs alongside other tasks expected from the postholders. The current focus is to embed a strong Information Asset Management practices and support the services offering necessary training to do them well.
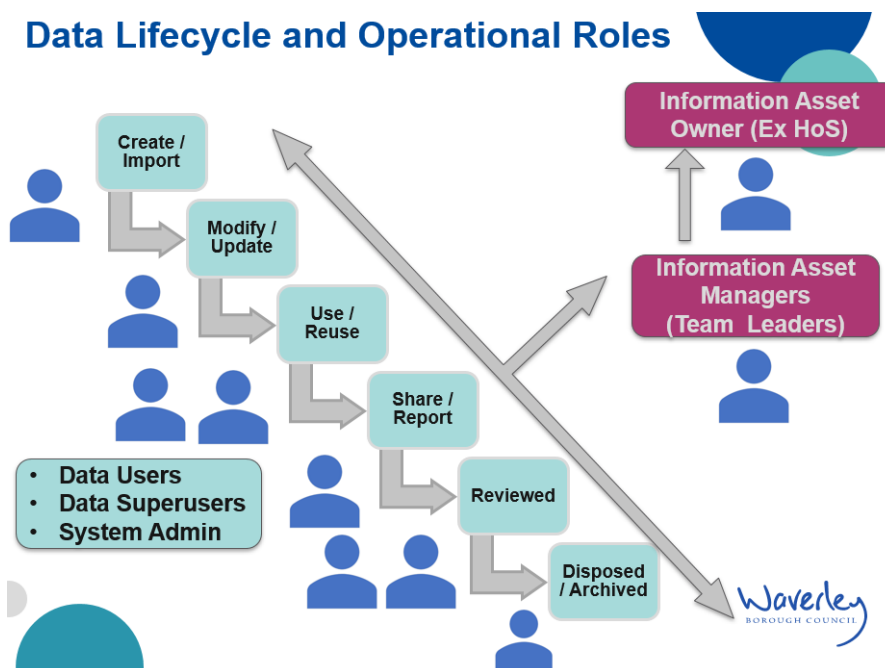
## 3.6 Policies and Procedures

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.

**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.



Our Vision: Data as an Asset

Data is recognised as a corporate asset, and as such, actively managed to support our digital first aspiration and successful delivery of our services

**External focus**     **Internal focus**

### Our Mission: 5 Focus Areas

| Customer | People | Processes | Policies | Culture |
|---|---|---|---|---|
| • Access to information and data they require<br><br>• Customer information is managed, processed in accordance to agreed purpose and shared securely<br><br>• Easy access to services at time of their choosing | • Data Roles are clearly defined<br><br>• Staff upskilled at all levels<br><br>• Staff feel confident when dealing with data | • Data sources and storage understood<br><br>• Data processes documented<br><br>• Data Lifecycles Managed<br><br>• Timely and accurate Analytics and Reporting used for data-driven and evidence based decision making and insight<br><br>• Data Sharing protocols created and appropriate agreements put in place | • Non-invasive but robust framework put in place<br><br>• Improvement Programme created with clear workstreams and accountable delivery plan<br><br>• Clear guidance available, specific to data roles | • Data vision clearly understood by staff<br><br>• Data seen as a critical asset<br><br>• Staff empowered to adopt new practices<br><br>• Staff are comfortable escalationg data related concerns |

### 4.1.2  2023-24 Reflection

It has been a very busy year with a successful progression of majority of the programme workstreams as per below:

- **Workstream 1 – Framework Development**
  **Status:** All planned work for 2023-24 have successfully completed with the review of the governance framework resulting in the creation of new IT, Data and Digital groups for each service area (reporting to a joint IDD Board). These will work going forward as an effective accountability and action monitoring vehicle, as well as facilitating clear communications about future plans and resourcing. The first cycle of meetings in February and March 2024 received a positive feedback, but more needs to be done with the teams to embed strong information asset management practices across the organisation. Multiple 'knowledge growth and awareness campaigns were run throughout the year using Yammer / Viva Engage Information and Data Management Channel for staff:
  - **Have you heard about Metadata? You already use it!**
  - **How can you and your team improve quality of your data?**
  - **Version control – 'Timestamp' vs ' Version sequencing'**
  - **Welcome to DataConnect23 by Gov.uk**
  - **Data deletion as an important element of good data management practices**

- **Workstream 2 – Data Management Practices Maturity Assessment**
  **Status:** Pilot completed, further reflection needed to decide how to successfully approach these assessments in the future across the organisation.
- **Workstream 3 – Development of a Data Classification Scheme**
  **Status:** Due to other priorities only the research phase has been completed, however due to the scale of this initiative, clear scoping of the project is needed to understand how to resource it. (Aim: 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)
- **Workstream 4 – Document & Content Management**
  **Status:** The page is close to completion but needs to be rolled out to staff and included in the IT Induction Training (Aim: 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)
- **Workstream 5 – Development of a Modernisation Plan for Legacy Systems**
  **Status:** All planned workstreams were successfully delivered, with major system replacement programmes and projects continuing in 2024-25 (Aim: Collaboration with the IT team and services to ensure data is stored in safe and efficient systems)

### 4.1.3  2024-25 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 – Information & Data Management Framework Development** The focus in 2024-25 will be to ember the data roles and responsibilities with the services when it comes to Information Asset Management, using IDD groups as a vehicle for this purpose. Support the organisation in reviewing our internal Data Sharing practices to introduce more efficiency whilst ensuring safety and integrity of our data and information.
- **Workstream 2 – Support Legacy Systems Modernisation Plan**
  Collaborate with the colleagues from IT team and services to ensure data is stored in safe and efficient systems and all necessary modernisation plans are on the way and well resourced

- **Workstream 3 – Project Management of M3 to Idox replacement system for regulatory services**
  Support regulatory services providing the overarching project management function until the full implementation at the beginning of 2025.
- **Workstream 4 – Data Quality Improvement Initiatives**
  Work with colleagues across the council on data quality improvement initiatives. The focus will continue to be promoting use of the UPRN and our golden address record in a form of LLPG ensuring that where possible key systems are directly integrated to our Local Land and Property Gazetteer [Waverley Borough Council - postcodes](#).
- **Workstream 5 – Data Deletion Project & Classification**
  This workstream is a continuation of the Workstream 3 from 2022-23 'Development of a Data Classification Scheme', focusing on two key phases: automation of data deletion in our key systems and introducing classification / file plan for our document management systems to help with better housekeeping going forward. The scoping stage will beginning in Summer 2024 and it is most likely to be a multi-year project requiring external expertise at times.

### 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 aims to implement security by concentrating on the following ten areas:
- Risk Management
- Engagement and Training
- Asset Management
- Architecture and configuration
- Vulnerability management
- Identity and access management
- Data security
- Logging and monitoring
- Incident management
- Supply chain security

In order to facilitate this there are various security solutions deployed at multiple points on the network to build up layered security.

The goal is to protect assets and data from malicious interception and interference and it is necessary to take both a pro-active and reactive approach. This requires ongoing hardening of hardware and software; creating and responding to automatic alerts; and investigating and implementing new technologies to improve defensive capabilities.

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

The council currently works towards PSN compliance and certification, but will be investigating adoption of the [Cyber Assessment Framework for Local Government](#) when PSN moves to

end-of-life. The objectives outlined in the framework concentrate on addressing risk, protecting against attack, detecting cyber events and minimising 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 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  2023-24 Reflection

There has been a concerted effort to both harden the onsite infrastructure and also migrate from legacy software to reduce the number of vulnerabilities that exist on the network.
The backup infrastructure has also received significant attention and investment and has been improved and upgraded to help protect against Ransomware and the potential of data loss or theft.

An investment has been made into staff training and to raise awareness of cyber security and the various methods that cyber criminals take to try and compromise an organisation by using social engineering or malicious technologies to gain a foothold.

Incident management has matured further through a process of categorising incidents and designing responses to alerts so that there is a more appropriate response by the relevant team, saving resource time on unnecessary administration. This is a continuing requirement as new types of threats and false positives are identified.

### 4.2.3  2024-25 Focus or improvement work planned

Further work is planned to improve offsite backup storage, concentrating on hardening and refining backup schedules. A greater focus will be made on cloud and supply chain security.

## 4.3  Information Governance & Data Protection

### 4.3.1  About the function

The Council has a Data Protection Officer (Information Governance Team Leader / DPO) responsible for ensuring compliance with the Data Protection Act 2018 (DPA 2018) and the UK GDPR (which is the UK's implementation of the European Union's General Data Protection Regulation (GDPR), these legislations set the framework for 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 DPO is a statutory role and part of the responsibilities of the DPO includes but not limited to managing rights of access to personal information known as 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  2023-24 Reflection

**Subject Access Requests (SARs)**

The 'Right of Access', introduced through the UK 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, but where appropriate, we apply various exemptions available under the UK GDPR and/or the Data

Protection Act 2018 which includes redacting or completely withholding third party data in any response (which is explained to the requestor).

Whilst the numbers can fluctuate, overall, there has been a steady decrease in the number of SARs received by the Council in the last financial year. The statutory timelines for responding to a SAR is one calendar month following receipt of the requestor's proof of Identity. Response time from services, when asked to provide the requested data is challenging and this often makes the compliance rate with response timescale low. Any challenge to SAR responses has been resolved without the need of escalation to the Information Commissioner's Office (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
2023 -  June to December - 23
2024 – Jan to May - 6

**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 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 undertake the mandatory data protection and the UK GDPR trainings as soon as they join.

### 4.3.3  2024-25 Focus or improvement work planned

In addition to the training referred to 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

### 4.4.1  About the function

The Freedom of Information (FOI) Act 2000 and the Environmental Information Regulations (EIR) 2004 gives any person a general right of access to information held (formally recorded) by public authorities. Following a restructure exercise in the Legal Services Team in April 2024, the Information Governance Team is responsible for handling the Council's FOI/EIR requests and SARs. The Information Governance team is headed by the Information Governance Team Leader/DPO who manages 2 other staff i.e. Access to Information Rights Officer and Access to Information Rights Coordinator. The FOI team relies on all service areas of the Council to promptly provide requested information to ensure compliance with the statutory timelines of 20 working days; the FOI team regularly chase up services areas for their inputs so as to avoid enforcement action from the Information Commissioner's Office (ICO) which includes fines and reputation damage

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  2023-24 Reflection

The new FOI system was being embedded and is now successfully assisting with the timely processing of FOI requests.

The team has completed all bar one of the audit recommendations assigned to them by the internal audit function in early 2023, the remaining action (which related to training of councillors and key officers) will be completed in 2024-25.

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 Q3 2023-24 Corporate Performance Report - Annexe 1 Final (waverley.gov.uk) on page 30 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 90% has been set)

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  2024-25 Focus or improvement work planned

The new Information Governance Team Leader will be starting in summer 2024 and will be reviewing training and other improvement plans for the Council with regards to compliance with the Freedom of Information Act 2000.

## 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  2023-24 Reflection

Due to workload the annual upload task has not yet been completed, but it is expected that all publication for 2023-24 subject to the Data Transparency Code will be completed by the end of September 2024. All the latest published documentation can be found on our website at Waverley Borough Council - Data transparency.

### 4.5.3  2024-25 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 with 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  Past reports

## 5.1  2022-24 First Annual Information and Data Management Report

The first report of this nature has been produced in 2022-23 and was presented to the Audit Committee on the 11 September 2023:
- Covering report Agenda item number: "Click to insert number" (waverley.gov.uk)
- Full Report 2022-23 Annual IDM Report - Annexe 1 Final.pdf (waverley.gov.uk)

The minutes from that meeting can be found on our website as part of the Agenda pack found under item AUD26/23 Agenda for Audit & Risk Committee on Monday, 11th September, 2023,

7.00 pm - Waverley Borough Council.

# 6  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