Report To:	Corporate Governance Committee
Date of Meeting:	November 29th, 2017
Lead Member / Officer:	Cllr Huw Hilditch Roberts
Report Author:	Karen Evans, Head of Education and Children's Services / Geraint Davies, Principal Education Manager
Title:	**Information Management and IT Management in schools**

1. What is the report about?

1.1 *To provide an update on the work undertaken in response to the report shared originally on September 28th, 2016 and further evidence provided on January 25th, 2017 which provided details on Information Management and IT Management in schools that received a "Low" Assurance rating.*

2. What is the reason for making this report?

2.1 *The report is to provide information on how the Council is implementing improvements in the way schools are managing information since the issue of the Internal Audit report that gave a Low Assurance. The Corporate Governance Committee requested a progress report to ensure that issues are being addressed. This is the second progress report.*

3. What are the Recommendations?

3.1 The Committee to review progress and decide whether it requires a further progress report.

4. Report details

4.1 *The internal Audit Report on September 9th, 2016 highlighted a number of areas that required improvements in the areas of Information Management and Information Technology in Schools.*

4.2 *The main issues raised in the audit report were as follows -*
- *44% of schools did not issue a Fair processing Notice*
- *18 schools did not have a Records Management Policy*
- *Some schools did not have a Data Protection Policy*
- *Most schools do not have a Social Media Policy*
- *50% of schools are not sure how to deal with Subject Access Requests*
- *Passwords are not secure enough*
- *36% of schools have no processes for sharing personal information*
- *Schools need to make further Cloud Security Considerations*
- *6 schools do not have a CCTV policy.*

4.3 *Initial improvements were made through the implementation of a Statutory Audit Tool that all schools complete. This tool provides the school and Local Authority with information on the levels of assurance in different areas of school*

management. Information Management is one area of the School Statutory Audit Tool.

4.4   *The results of the audit completed by schools in December 2016 were as follows. .*

	Description of Judgement
Green	Good / Excellent quality
Yellow	Acceptable Quality
Orange	Poor Quality
Red	Priority for improvements

Questions Asked	G	Y	O	R
Does the school have a Data protection Policy?	93%	0%	0%	7%
Do you notify the Information Commissioners Office annually?	73%	0%	0%	27%
Do you have an individual with responsibility for Data protection?	96%	0%	0%	4%
Do you have a system in place for securely disposing of confidential waste?	94%	0%	0%	6%
How effective is your training programme?	7%	25%	52%	16%
How effective is your Fair Processing Notice?	34%	27%	23%	16%
Do you have a CCTV policy and clear signage?	55%	23%	9%	13%
How effective is your handling of Subject Access Requests?	23%	32%	30%	15%
How secure are your databases that hold personal information?	62%	32%	0%	6%
Do you lock cupboards, filing cabinets that hold personal information?	41%	36%	16%	7%
Do you have a clear desk policy?	7%	32%	27%	34%
Do you have a Records Management Policy	66%	0%	0%	34%
Do you have an Information Breach procedure?	31%	0%	0%	69%

4.6   *The audit process was clear in highlighting targeted support in certain areas and with certain schools.   The following steps were taken to respond to and support schools in their Management of Information.*

- *All schools sent an updated Data protection Policy to adopt.*
- *All schools are now registered with the ICO.*
- *Schools have all been instructed to identify an individual with responsibility for Data protection.*
- *All schools understand and have access to the DCC Confidential Waste contract.*
- *The Information Commissioners Office delivered training to Head Teachers on February 9th, 2017.*
- *The Information Commissioners Office delivers training to Governors.*
- *Following a review due to regulatory changes a new version of the Fair Processing Notice has been issued to all schools.*

- *A new bilingual CCTV policy has been sent to all schools for adoption by the Governing Body.*
- *Training has been provided on handling Subject Access requests.*
- *Schools have been instructed that passwords need to be complex. Fact sheet on complex passwords and Data Security sent.*
- *Data Controllers in all schools have a responsibility to ensure all cabinets are locked if they hold sensitive information.*
- *Information on Clear Desk Policy has been sent to schools and strongly advised to adopt it.*
- *Records Management Policy sent to all schools to adopt.*
- *Information security Breach procedure sent to all schools to follow.*
- *New Social Media Policy has been shared with schools.*
- *Guidance on ICloud security provided for all schools.*
- *Training session on Data Security held on 15.02.17*

4.7 *Further training will be required when the new GDPR (General Data Protection Regulations) come into force in May 2018/*

4.7 *Responsibility lies with the Data Controller in each school to ensure policies and procedures are followed and during the spring / summer term 2017 10% of schools were visited to ensure the accuracy of the Information provided in the audit. The QA process confirmed that the responses from schools was an accurate reflection of the school position.*

4.8 *Denbighshire officers have led the development of a regional on-line audit toolkit that allows schools and the LA to monitor, support and challenge. Previously paper audits and Survey Monkey was used that resulted in a snapshot of information. We are now in a position to see, analyse and interrogate live information. Schools each have a username and password and complete the audits adding action points and deadlines. School staff, Governors and LA officers can now monitor progress and improvements offering support and challenge where appropriate. A demonstration of the online audit tool launched at Venue Cymru in September 2017 on behalf of the 6 North Wales Authorities will be offered in the meeting.*

4.9 *The Information management Audit was reviewed again in October, 2017 to measure the impact of the support offered. Both sets of results have been compared and are provided below.*

Questions Asked	G		Y		O		R	
	Dec 2016	Oct 2017	Dec 2016	Oct 2017	Dec 2016	Oct 2017	Dec 2016	Oct 2017
Does the school have a Data protection Policy?	93%	64%	0%	34%	0%	2%	7%	0%
Do you notify the Information Commissioners Office annually?	73%	76%	0%	17%	0%	2%	27%	0%
Do you have an individual with responsibility for Data protection?	96%	83%	0%	17%	0%	0%	4%	0%

Do you have a system in place for securely disposing of confidential waste?	*94%*	*87%*	*0%*	*11%*	*0%*	*2%*	*6%*	*0%*
How effective is your training programme?	*7%*	*24%*	*25%*	*46%*	*52%*	*24%*	*16%*	*6%*
How effective is your Fair Processing Notice?	*34%*	*46%*	*27%*	*39%*	*23%*	*9%*	*16%*	*4%*
Do you have a CCTV policy and clear signage?	*55%*	*50%*	*23%*	*13%*	*9%*	*6%*	*13%*	*8%*
How effective is your handling of Subject Access Requests?	*23%*	*37%*	*32%*	*39%*	*30%*	*13%*	*15%*	*4%*
How secure are your databases that hold personal information?	*62%*	*74%*	*32%*	*27%*	*0%*	*2%*	*6%*	*0%*
Do you lock cupboards, filing cabinets that hold personal information?	*41%*	*78%*	*36%*	*20%*	*16%*	*2%*	*7%*	*0%*
Do you have a clear desk policy?	*7%*	*24%*	*32%*	*33%*	*27%*	*35%*	*34%*	*8%*
Do you have a Records Management Policy	*66%*	*33%*	*0%*	*35%*	*0%*	*17%*	*34%*	*15%*
Do you have an Information Breach procedure?	*31%*	*22%*	*0%*	*28%*	*0%*	*24%*	*69%*	*17%*

5. **How does the decision contribute to the Corporate Priorities?**
Not applicable - there is no decision required with this report.

6. **What will it cost and how will it affect other services?**
Not applicable - there is no decision required with this report.

7. **What are the main conclusions of the Well-being Impact Assessment? The completed Well-being Impact Assessment report can be downloaded from the [website](#) and should be attached as an appendix to the report**

Not applicable - there is no decision required with this report.

8. **What consultations have been carried out with Scrutiny and others?**
Not applicable - there is no decision required with this report.

9. **Chief Finance Officer Statement**
Not applicable - there is no decision required with this report.

10. **What risks are there and is there anything we can do to reduce them?**
Section notes: For guidance on risk assessments contact the Corporate Improvement Manager (or the Head of Business Planning and Performance).

11. **Power to make the Decision**
Not applicable - there is no decision required with this report.