Brighton & Hove City Council

Strategic Risk Assessment Report

Director of Finance & Senior Information Risk Owner (SIRO)

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ROM Issue:	Information Governance Management	Responsible Officer:	Director of Finance & Senior Information Risk Owner (SIRO)
		Risk Code:	SR10

Identified	The council must operate to a high standard of information governance within the overall context of openness and transparency.
Potential Conseq	The council recognises that if it fails to manage data effectively then : * Individuals may suffer loss or damage * The council may suffer loss of reputation, financial penalties and/or other enforcement penalties * It may result in a loss of trust in the council by citizens and partners and sub-optimal decision making.

Initial:	High		**Revised:**	High		**Future:**	Significant	
Risk Identified Date:	8/5/2012		**Date Modified:**	9/1/2013		**Date Modified:**	12/10/2012	

Risk Category:	- BHCC Strategic Risk
	- Customer / Citizen
	- Legislative
	- Professional / Managerial

Existing Controls:	* An action plan which will deliver the improvements identified by the Information Commissioner's Office (ICO) is in place and ongoing. The plan includes; - Redevelopment of staff training and awareness programme for Data protection. In phase 1 we have implemented - Foundation Level Data Prorection training in place (face to face); Role specific information co-ordinators training; - Complete overhaul and consolidation of all policy and guidance in relation to Information Management and Information security. All information based policies are ready for approval by the IMB (Information Strategy, Information Security Policy. Data Protection Policy. Information Handling Policy, Retention Strategy, Retention Strategy, Retention Schedule in phased development, a standard policy template, Data Protection Guidance in the event of a breach, Protective Marking Guidance, Encryption Guidance, Working from Home Guidance, Acceptable Use of ICT (Ts and Cs) - Security review, completed: - Records management; undertake a council wide audit of information, by a phased programme of work which has been started in key departments along with the information asset register and retention schedule and document standards * Information Management Board in place, interalia it sets standards for information management, ensures these standards are embedded within the organisation, communicates key messages to the organisation and acts as the final arbiter * Information Governance Steering Group in place and oversees the delivery of the work plan and action plan for ICO Compliance Audit and reports * Open Government Licence implemented to support open government agenda * Review undertaken "Respecting Confidentiality in the Context of Openness and Transparency" * "One off " financial Risk Provision to meet in-year commitments

Effectiveness of Controls:	Uncertain	**Issue Type:**	Threat
		Risk Treatment:	Treat,Treat

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Solutions: Through the Information Management Board identify available funding streams to meet implementation costs of improvements to Information Management arrangements

Information Management Board to develop arrangements and, through Heads of Service, develop accountability for information asset ownership

Work with individual Heads of Service and key officers to implement and embed the information governance framework

Review the council Publication Scheme to ensure that the council is transparent and meets with legal obligations

Implement an improvement plan (with short, medium and long term goals), all of which will increase the robustness of our environment

The ICO will issue a report following re-examination of arrangements in September 2012

Commission an accredited consultant to undertake a gap analysis of the council's compliance with the Code of Connection which allows council use of the GCsX Government network

Deliver implementation schedule/action points from the "Respecting Confidentiality in the Context of Openess and Transparency" review and monitor progress through the Officers' Governance Board