

## Background and Context

- 1.1 The Council collects, processes, and holds numerous items of information, including personal information. The Information Asset Owner (IAO) is key in protecting the Council's information with responsibility for understanding and managing the risk associated with holding and using the information held within their service areas. IAOs help to ensure compliance with the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 and support the Senior Information Risk Owner (SIRO).

## Scope and Objectives

- 1.2 Internal Audit reviewed IAO activity at the Council against the Cabinet Office's 'Guidance on the Information Asset Owner (IAO) Role', May 2018 (The Cabinet Office Guidance), which contains mandatory elements that are expressed as "musts". Additionally, IAOs were surveyed on their understanding and application of their role and responsibilities.

## Audit Opinion

- 1.3 Overall, Internal Audit obtained **limited assurance** that effective internal control and risk management measures were in place.

## Key Messages and Findings:

- 1.4 The main positive findings of the review were:
- IAOs have been nominated for all services; they are Directors, so are sufficiently senior and they are aware that they have been nominated for this role
  - An Information Governance structure that accords with the Cabinet Office Guidance has been created with roles and responsibilities identified and documented.
- 1.5 The Internal Audit survey outcomes indicated, however, that IAOs do not consistently understand or fulfil their roles and there was significant non-compliance with the Cabinet Office Guidance. Many IAOs reported that they had not:
- Been provided with sufficient guidance, training, and support to enable them to understand and fulfil their role effectively
  - Established appropriate reporting arrangements
  - Provided assurance to the SIRO to support his annual report.
- 1.6 Also, key guidance for IAOs was not available on 'The Source'.

## Management Response

- 1.6 The findings of the report have been accepted by management who have agreed actions to address them. These actions include the Information Governance Team:
- Providing training and increasing awareness for all current IAO's to address the guidance within the Cabinet office paper, as well as the issues raised by the Internal Audit survey
  - Adding guidance to 'The Source' and publishing draft documents/policies
  - Working with HR colleagues to ensure coverage in onboarding for new starters coming into IAO roles, so new starters are aware of their IAO responsibilities
  - Ensuring Lead Custodians/Data Custodians have been nominated and the IAOs are aware of who these individuals are in their area and how the reporting/escalation is done

- Ensuring IAOs are aware of their responsibilities around giving assurance for the Annual Governance Statement (SIRO Assurance)
- Using the recently restarted Information Governance Working Group, that is primarily made up of the Lead Custodians to improve understanding within those nominated individuals to ensure they are aware of their responsibilities
- Continuing discussions at Executive Director Meetings (EDMs) including discussions on trends and planned improvements/remediations; the reporting structure document will be reviewed and amended to provide clarity and include planned rollouts of tools such as Egress.