Information Governance Support

Essex County Council

Approved by	Executive head teacher and board of governors
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Version	1
Review Date	Annually

INFORMATION GOVERNANCE FRAMEWORK

A process for overseeing the performance of the Organisation against a range of Information Governance metrics, analysing the data and feeding it into strategy, policy and risk reviews for continuous improvement

Contents

A. Copyright Statement

B. How to use this Framework

1. Basic Evidence Pack:

The following are activities to be undertaken to comply with the requirement to evidence legally compliant processing of personal data

References are to documents in Section D.

A	Use the documents in Section **A** to determine which individuals will act in the various roles which have responsibility for managing this framework, and which committees or teams will have what responsibilities.
B	Use document **H1** (IAR Tab) to create a list of the categories of record you hold which contain personal data. Use the DLM tab to then record the ways in which you receive and share the information you have identified on the IAR tab, setting clear rules for how the data should be received and sent securely.
C	Use document **H2** to explain how your technology and how your staff are going to keep personal data secure. Identify the various roles within your organisation and decide what training messages you need to deliver to each and how this will be best delivered.
D	Review, adopt and publish the Privacy Notice templates in the appendices of document **D2**
E	Review, adopt and publish the Policies in section **C**
F	Review the documentation you have which controls the services delivered to you by your suppliers who handle personal data on your behalf (Contracts, Agreements, Terms & Conditions etc) to ensure you hold appropriate commitments. Ask them for assurance that they comply with Data Protection law (Document **E7**).
G	Ensure you have a current and compliant registration in place with the ICO (Use the templates in document **D9**)
H	Review the proposed retention rules in document **D8**. Match them to the information assets you have identified in document **H1** and include the agreed retention periods in your Privacy Notices.

2. Processes:

Processes to successfully manage certain activities where the law requires they are undertaken in a certain way

References are to documents in Section D.

2.	Activity Management	
A	Ensure new (or changes to existing) processes which involve personal data are assessed for whether a statutory Data Protection Impact Assessment needs to be undertaken, using documents **G4** & **G5**
B	Ensure events which meet the criteria of a personal data security incident are handled according to procedure **D6**
C	When you are considering engaging the services of a supplier to process personal data on your behalf, review the risk of the activity (**G3**) and determine which of controls in documents **E1-4** is appropriate.
D	When you are sharing data with another Data Controller, ensure you have captured whether this is lawful and how it should be undertaken in your Data Flows register (**H1**) and there is an adequate Sharing Protocol in place.
E	When you are providing access to personal data to an individual who is not employed by a company with whom you have a contractual relationship, consider use of document **E6**
F	When a requestor makes a statutory request for information or to exercise their other rights under Data Protection law, ensure you have considered this appropriately and responded using standard text in documents **F1-3**

3. Report & Review:

Activities to review the effectiveness of the measures you have in place to comply with the law.

References are to documents in Section D.

3. Review	
A	Collect and report data on how well you are managing your personal data activities. Use document **B1** for this.
B	Undertake an annual review of your policies which relate to information governance (**B2**) noting changes and approvals in document **D1**
C	Undertake an annual review of your personal data risks (**B2**) using **G2** to initially assess risks, **G3** to rate risks, and **G1** to gather, manage and present risks
D	Undertake an annual review of your contracts with suppliers to ensure they are being complied with
E	Undertake an annual review of the effectiveness of information governance training, using staff feedback and analysing the nature and frequency of security incidents (**B1**).
F	Undertake a review of you CCTV processes (if applicable) using the procedures in document (**D5**)
G	Ensure the content of your registration with the ICO has been reviewed as part of the process for making the required ICO annual payment
H	Ensure your Data Protection Officer has reviewed and commented on the review outcomes before they are reported to a governing body.

C. Records of Processing Activity

Data Controller	St Margaret's C of E Academy	
Contact Details	Address	London Road, Bowers Gifford
	Phone	01268 552176
	Email	admin@st-margaretsacademy.co.uk
	Website	www. st-margaretsacademy.co.uk
Data Protection Officer	Lauri Almond (Essex County Council)	
Purposes of processing	The purposes for which personal data is processed are detailed within the Organisation's Privacy Notices provided below (**Section D, D2**)	
Description of the categories of:		
Individuals	This information is detailed in the Organisation's entry on the Register of Data Controllers available at this weblink www.ico.org.uk. This is supplemented by detail in the Information Asset and Data Lifecycle Mapping Register provided below (**Section D, H1**)	
Personal Data		
Recipients		
Details of transfers to third countries	This information is detailed in the Information Asset and Data Lifecycle Mapping Register provided below (**Section D, H1**) and is included in the Organisation's Privacy Notices (**Section B, D2**)	
Retention schedule	Our retention schedule is provided below (**Section D, D7**)	
Description of Technical and Organisational Security Measures	An outline of our technical and organisational security measures is provided below (**Section D, H2**)	

D. Framework Documentation

A. Roles

1	**1.SIRO Role Profile.docx**	Senior Information Risk Owner (SIRO): Role Profile Defined responsibilities of the SIRO to be used in addition to an existing substantive role profile. Usually this is a Executive Headteacher's role.
2	**2.DPO Role Profile.docx**	Data Protection Officer (DPO): Role Profile Defined responsibilities of the DPO to be used in addition to an existing substantive role profile or to held understand and work with an outsourced or shared role.
3	**3.IC Role Profile.docx**	Information Champion: Role Profile Defined responsibilities of Information Champions to be used in addition to an existing substantive role profile, if the organisation decides that it wants a network of staff with additional responsibilities in this area.
4	**4.IG Board TOR.docx**	Information Governance Board: Terms of Reference Defined role of the Information Governance Board. Can be wholly the responsibility of a group such as Senior Leadership Team, Full Governors, or a Governors Sub-Committee, the responsibilities can be shared between the various groups.
5	**5.DPO Responsibilities.docx**	Data Protection Officer (DPO) Activities A summary of the main activities to be provided by a Data Protection Officer.

B. Reporting

1	**1.Reporting Template v5.xlsx**	Reporting Template A comprehensive overview of Information Governance performance data for review, analysis and action planning
2	**2. Performance Reporting and Review**	Performance Reporting and Reviewing Detailing the processes in place to monitor information governance performance and to review the effectiveness of the governance framework
3		Report Examples Examples of Reports, and minuted evidence of meetings at which the reports were reviewed

C. Strategy & Policy

1	**1.IG Strategy.docx**	Information Governance Strategy

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		A strategy document providing a methodology for implementing solutions to improve and maintain Information Law compliance
2	2.Information Governance Framewo	**Information Governance Framework Policy**
		Supporting effective corporate management of Information Governance activities; including key roles and strategic policy and risk reviews
3	3.Data Protection.docx	**Data Protection**
		General rules in complying with Data Protection law
4	4.Statutory Requests.docx	**Statutory Requests**
		Requirements for managing requests for information to comply with the Freedom of Information Act 2000 (FOI), the Environmental Information Regulations (EIR), the Data Protection Act 1998 (DPA) and from 25th May 2018 the General Data Protection Regulations 2016
5	5.Acceptable Personal Use.docx	**Acceptable Personal Use**
		Explaining what is acceptable use of resources and assets provided by us, including IT facilities and covering personal use
6	6.Data Handling Security.docx	**Data Handling Security**
		Responsibilities for managing IT equipment, removable storage devices and papers, in the office, in transit and at home or other work locations
7	7.Security Incidents.docx	**Security Incidents**
		Responsibilities for reporting and investigating breaches of Information Governance policy, including reporting to the Regulator
8	8.Records Management.docx	**Records Management**
		Responsibilities for management of information to support secure access and effective retention, destruction and preservation processes
9	9.Policy Template.docx	**Policy Template**
		Template document for consistent management of additional policies

D. Procedures

1	1.Policy Change Log.xlsx	**Policy Change Log**
		For managing changes to policies over time, approval recording and publication to the Organisation
2	2.Privacy Notices v4.docx	**Privacy Notice**
		Ensuring Data Subjects are well-informed about the why their personal data is necessary and how it will be managed in line with their statutory rights

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3	3.Consent.docx	**Consent** Ensuring processing under consent is appropriate and that the quality of consent is compliant with the law
4	4.Personal Data Minimisation.docx	**Personal Data Minimisation** Ensuring the processing of personal data is kept to a necessary minimum in accordance with the law
5	5.Surveillance Management.docx	**Surveillance Management** Ensuring effective processes are in place for the management of equipment which records personal data in video in accordance with the law and relevant codes of practice
6	6.Security Incident Management.docx	**Security Incident Management** The process of investigating and managing instances of breaches of Information Governance policy
7	7.IRMS Records Management Toolkit f	**Records Management Best Practice Guide** Guidance published by the Information & Records Management Society (IRMS) on best practice for managing records, including a list of the main record types held by schools and their associated retention management provisions. *This document is owned by IRMS.*
8	8.Retention Schedule v2.docx	**Retention Schedule** Template for publishing an approved set of retention rules. Content is derived from the IRMS document above.
9	9.ICO Notification - Register of Data Cont	**ICO Notification - Register of Data Controllers** Standard details provided by the ICO for Data Controllers to describe the nature of their personal data processing. *The document content is owned by the ICO.*
10	10.Procedures Template.docx	**Procedures Template** Template document for consistent management of additional procedures

E. Sharing Data with Suppliers and Partners		
1	1.Contract Schedule.docx	**Contract Schedule** Standard clauses to provide basic contractual controls over Data Processor compliance with information law
2	2.Third Party Information Policy Re	**Third Party Information Policy Requirements** Complementing the contractual clauses with additional agreement from Data Processors to comply with key Organisation policies
3	3.Procurement Stage 1 - Self Assessment.d	**Procurement Stage 1** This document should be completed by all bidders for procurement exercises relating to services which process personal data.
4	4.Procurement Stage 2 - Evidence.docx	**Procurement Stage 2**

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		This document should be completed by all preferred bidders involved in procurement activities which have been categorised as high risk data processing
5	INFORMATION SHARING PROTOCOL	**Information Sharing Protocol** A template for public agreements for personal data sharing with partners through the Whole Essex Information Sharing Framework. For use where there is no existing sharing agreement and one therefore needs to be initiated. *This document is owned by* [WEISF].
6	6.Non-Disclosure Agreement.docx	**Non-Disclosure Agreement** Confidentiality agreement for individuals not employed by an organisation with whom a contract or similar agreement exists
7	7. Letter to Data Processors v2.docx	**Letter to Data Processors** Standard text to communicate to Data Processors your need for their assurance over compliance with Data Protection law

F. Statutory Request Templates

1	1.FOI Response Templates.docx	**Freedom of Information Requests** Response Templates for Requests made under the Freedom of Information Act (2000). Use these standard responses as a basis for ensuring compliance with the law.
2	2.EIR Response Templates.docx	**Environmental Information Regulations Requests** Response Templates for Requests made under the Environmental Information Regulations (2004). Use these standard responses as a basis for ensuring compliance with the law.
3	3.SAR Response Templates.docx	**Subject Access Requests** Response Templates for Requests made under the Data Protection Act (1998) and the General Data Protection Regulations (2016). Use these standard responses as a basis for ensuring compliance with the law.
4	4.Model Publication Scheme.pdf	**Model Publication Scheme** A standard form to describe what information you will routinely publish or make available on request. *This document is owned by* [ICO.]
5	5.Publication Scheme Content.doc	**Publication Scheme Data** Suggested content for information you may choose to make available through your Publication Scheme.

G. Risk Management

1	1.Corporate Risk Register.xlsx	**Corporate Risk Register** A register which provides an overview of all corporate risks, their ratings, how they are to be managed and who is responsible for doing so. This document supports an annual risk review activity
2	2.Risk Assessment Form.xlsx	**Risk Assessment**

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Where a new risk has been identified, it can be articulated via this form and presented to the appropriate board or role for an assessment on how best to manage it. This is a mechanism for adding a new risk to the Corporate Risk Register

3	3.Risk Treatment Process.docx	**Risk Treatment Process** A consistent scheme for formally rating Information Governance risks
4	4.Privacy Impact Assessment (Form) v:	**Privacy Impact Assessment Template** Use this form to capture the privacy issues of new (or changes to existing) activities which involve the processing of personal data, and to record approvals or rejections. The form can also be used to manage Data Protection Impact Assessments for 'high risk' processing under the GDPR
5	5.Privacy Impact Assessment (Guidanc	**Privacy Impact Assessment Guidance** Reference and guidance document to support completion of Privacy Impact Assessment forms
6	6.Privacy Impact Assessment (Example	**Privacy Impact Assessment Example** An example completed assessment covering Capita SIMs

H. Records of Processing Activity

1	1. Information Asset and Data Flow Mappir	**Information Asset & Data Flow Mapping Register** Use to capture and review data for an Information Asset Register and Data Flow Mapping. Assign owners and record other metadata about the information you hold and process as assurance evidence to a regulator, as a risk management tool and a useful business efficiency aid
2	2. Security Measures v2.docx	**Description of Organisational & Technical Security Measures** Outline of the measures adopted to comply with Principle 6 of the General Data Protection Regulations

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E. Document Control

Changes in this version

Section	Change Type	Details
A	New	Introduced a copyright statement to ensure your use of this framework protects Essex County Council's commercial interests
B	New	Introduced a summary of how the documents within the framework can be used as part of step-by-step implementation plan
D:A5	New	Presents the main required activities of the Data Protection Officer
D:B1	Amend	Added columns to the Security Incidents tab to allow cross-referencing with affected Information Assets and Data Flows
D:C3	Amend	One correction to Point 21 on Data Protection Policy
D:D2	Amend	Added additional Model Privacy Notice relating to Governors Data and renumbered the Annexes to better explain the publishing process
D:D5	Amend	Updated Annex A with impact assessment form
D:D9	New	Supporting your notification of processing details to the ICO
D:F4	New	ICO guidance on presenting a publication scheme
D:F5	New	Advice on what your publication scheme should contain
D:G6	New	Example Impact Assessment form completed for use of Capita SIMs
D:H1	Amend	Added columns to the Asset Register and Data Flow tabs to allow cross-referencing with related security incidents. Amended columns 'Q' to 'T' to cover details of data subjects as well as data recipients Added an 'Introduction' tab which some explanation and guidance on what the document is for and how it should be used
D:H2	Amend	Added example text which should be reviewed and changed to match the measures in place in the school