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| **TOWER HAMLETS –KEY ACTIONS FROM ICO AUDIT**  |
| Topic | Recommendation | Action Plan | Who and when |
| Information Asset Register | Further development of the Information Asset Register is required, to include manual records, and be linked to the Council's retention schedules. This will enable these assets to be identified, have owners and be appropriately monitored. | Complete the Information Asset Register in accordance with the current work plan, preparing a single Information Asset Register which combines the Council’s electronic and paper records. The register will have an owner, be regularly reviewed and include details of who is responsible for the assets, where they are stored, who has access to them and what (if any) personal data they contain. | 31 March 2015 Service Head - Legal Services |
|  |  | Continue the work of interlinking the Information Asset Register with systems information. | 31 March 2015 Service Head - ICT |
| Records ManagementPerformance measures and risk | The Complaints and Information team and the Information Governance Group provide the focus on the records management function. However, this could be improved by identifying performance measures that reflect their records management responsibilities and ascertain the risks that non-compliance with the Lord Chancellors Code of Practice on Records Management may present to the authority. Both performance measures and risks which have been identified should be documented and regularly reported to the Information Governance Group. | Adapt Records Management policy to specify how compliance with the policy and the supporting standards, procedures and guidelines will be monitored and stipulate suitable performance measures. | 31 December 2014 Service Head - Legal Services |
|  |  | Confirm and formalise which staff hold specific responsibility for records management in each Directorate and update job descriptions | 31 March 2015Service Head - Legal Services |
|  |  | Run a regular report of archive boxes that have not been returned to storage after a reasonable time limit to ensure all boxes out on loan are still required and have a named owner | 30 November 2014 and monthly thereafterService Head – Corporate Property |
|  |  | Report key performance indicators on the management of the archive contract regularly to the Information Governance Group under a standing agenda item | Established 30 November 2014, then every 6 weeksService Head – Corporate Property |
| Internal Audit | The Council should make greater use of their Internal Audit function to independently review the effectiveness of policies and procedures concerning Information Governance, data protection, IT security and records management. These reports should be routinely made available for review and consideration at Information Governance Group meetings. | The Information Governance Group (IGG) should receive a summary of any audits with substantive data protection implications to better facilitate corporate oversight and monitor improvements. | Established19 November 2014. Standing item every 6 weeks at IGG Service Head – Audit and Risk Management |
| Starters / LeaversLink HR / ICT / standalone ICT systems | It is recognised that arrangements around starters / movers / leavers are in place but may benefit from being further enhanced. Procedures should be implemented to ensure HR provide a regular list of these staff to the IT service desk, Social Care IT and Facilities Management and spot checks should be performed to ensure procedures are working satisfactorily. | Approved staff from relevant services have access to the Human Resources starters / leavers list which is updated weekly.  | Established 5 September 2014. (weekly ongoing process) Service Head - Human Resources  |
|  |  | ICT sign-in access is removed when leaver’s forms are completed. Regular checks on access to stand-alone software are conducted. | Established 5 September 2014 Monthly reports Service Head - ESCW Resources  |
|  |  | Working group meetings are currently in place between Information Governance, Human Resources and Facilities Management regarding the implementation of new security access systems. | Established 30 November 2014Service Heads - Human Resources and Corporate Property |
| Confidential waste | A single Council-wide process for collection, storage and disposal of confidential waste should be introduced which will help provide assurance that waste is being managed securely. The Council should review the type of containers being used in offices to store confidential waste before disposal and the security of areas holding bulk confidential waste before collection by the contractors. | Develop a single, multi-site process for collecting confidential waste sacks as they are filled for storage in centrally secured storage area. Communicate this to staff and reiterate their responsibilities.. | 30 November 2014Service Head – Corporate Property  |
|  |  | Enhance security in the office surrounding archive boxes awaiting transfer to off-site storage. The external door is already secured automatically and only unlocked when boxes are being transferred. CCTV is also positioned to cover this area. The storage area internal entrance has been fitted with a new access card entry system and new protocols have been issued to staff regarding use of the area. | Completed 4 September 2014Service Head – Corporate Property |
|  |  | Update Data Disposal Procedure. This was part of the current year work-plan. The process has been reviewed and updated it will be submitted to IGG for comment | Drafted 30 November 2014, to be reviewed and submitted to IGG January 2015Service Head – Legal Services |