Appendix 1 - Full Business Case and Options Appraisal

Project Information	
Project Name	General Data Protection Regulation (GDPR) Resourcing Project
Directorate/Service	IT & Digital, Orbis
Full Business Case Author (Name and job title)	Dan Snowdon, Head of Strategy & Engagement IT Digital (BHCC) Katie Rees, Information Governance Consultant (BHCC) Peter Bode, Records Manager (BHCC)
Date Full Business Case drafted	21/09/2017
Senior Responsible Owner/ Project Executive (Name and job title)	David Kuenssberg, Executive Director Finance & Resources (BHCC)
Programme or Project Manager (Name and job title)	Katie Rees, Information Governance Consultant (BHCC) Peter Bode, Records Manager (BHCC)

1. Executive Summary & Recommendations

This full business case explores resourcing options to enable Brighton & Hove City Council to meet its obligations under the General Data Protection Regulation (GDPR) and requests up to £914,000 over 4 years for IAA employment, software development, project management resource and other associated recommendations as detailed within the business case.

The GDPR will come into force in May 2018 and will considerably strengthen the compliance regime around collection and use of personal data. It is known that the regulator (the ICO) is bolstering its regulatory staff in preparation for this and can be expected to be an interventionist regulator.

It can be expected that the regulatory change will require the Council to both prepare for the start of enforcement next year, but also build compliance into ongoing operations, changes to corporate structure, engagement with partners and procurement/development of new systems. This business case proposes that the Council adopt a model built on the concept of Information Asset Ownership set out in ISO27001, and sets out to equip asset owners and their delegates with the tool necessary to manage their information. With the support of the central Information Governance Team, this model would appear to provide the most cost effective and resilient approach to development and maintenance of compliant processes for personal information.

2. Objectives

The project aims to co-ordinate activity across BHCC to ensure that the authority is prepared to demonstrate compliance with GDPR to supervisory authorities by May 2018. This will include the following tasks:

- Devise and deploy a comprehensive communications plan to raise awareness across the organisation
- Conduct a GDPR Readiness Assessment by mapping existing operational documentation and allow us to identify areas where privacy management must be enhanced to comply
- Audit BHCC information assets - what information is held; where it is held, legal basis for processing; retention policy; sharing arrangements, etc.
- Establish an Information Asset Framework across the Council, ensuring compliancy activities such as CoCo and IG Toolkit are factored into the framework to help manage work load
- Refresh IG training and guidance to include changes brought about by GDPR and other legislative changes
- Review and improve data breach processes and create a robust incident management process which should help mitigate information risk thus improving internal audit outcomes
- Embed data management and privacy by design in standardised methods for business change, especially with regard to Digital First workstreams
- Create a new consent model allowing the organisation to evidence and identify consent mechanisms and processes for processing data
- Ensure services establish compliant processes for data retention/deletion
- Provide a clear view of all information held across the Council which will allow us to assess the need to publish information saving time and costs of the Freedom of Information Request process.
- Report meaningful metrics to stakeholders such as public, business, compliance and legal executives

- Where full compliance is not achieved, the project will ensure a clear plan is in place.

3. Background and context

The EU General Data Protection Regulation (GDPR) is new legislation which is intended to strengthen, unify and enhance data protection for all individuals within the European Union and will apply in the UK from 25 May 2018. The government has confirmed that the UK's decision to leave the EU will not affect the commencement of the GDPR.
The regulation applies to 'data controllers' (i.e. BHCC) and 'data processors' (agency acting on the controller's behalf) and, like the Data Protection Act 1998, applies to the 'personal data' of living people. However, the GDPR's definition of personal data is more expansive and reflects changes in technology and the way organizations collect and manage their information:

"personal data is any information relating to an individual, whether it relates to his or her private, professional or public life. It can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer's IP address."

The introduction of the GDPR places specific legal obligations on the authority (e.g. the requirement to maintain records of personal data and processing activities) and will require comprehensive changes to business operations.

Although there are a large amount of new legislative requirements, these bring with them collateral business benefits to the organisation.

Which corporate priorities and principles (as outlined in the Corporate Plan) will it helps deliver?

Public Accountability - Strengthening our partnership delivery arrangements and building collaborative, trustful and empowering relationships between council and citizens.
Citizen Focused – A council that starts from the citizen's point of view, making services simpler, more connected and more personal.

What other programmes, projects or services does it link to?
GDPR will link to multiple activity streams across the organisation such as:

- **Digital First –** One of the programmes highlights looks at bringing together data to help plan services for future and combat fraud.
- **Independent Inquiry into Child Sexual Abuse (IICSA)** - This Inquiry will investigate whether public bodies and other non-state institutions in England and Wales have taken seriously their responsibility to protect children from sexual abuse, and make meaningful recommendations for change in the future. GDPR focuses on lifecycle management and the need for appropriate retention periods. This will help us ensure records are appropriately managed and safely reviewed.
- **City Employment and Skills Plan –** One of the recommendations is to develop common data sharing and tools to better identify and support needs.
- **NHS Digital–** NHS Digital (formerly HSCIC) uses information and technology to improve health and care. BHCC's Health & Adult Social Care works closely with the NHS to look at how best to support and provide services to the community whilst decreasing demand through better access to care based on information sharing.
- **IG Toolkit -** NHS Digital (formerly HSCIC) requires all organisations to complete an annual self-assessment which looks at how organisations comply with legal rules and central guidance set out by Department of Health policy for information governance requirements.
- **Surveillance Camera Commissioner Self-Assessment** – The Protection of Freedoms Act 2012 places Local Authorities on a list of 'relevant authorities' (s.33 (5)) who must pay due regard to the code when using surveillance camera systems. BHCC is responsible for ensuring that your systems adhere to the twelve guiding principles in the code of practice. BHCC deploys surveillance equipment across the city and has responsibility for maintaining the CCTV framework in line with best practice requirements.
- **PSN CoCo Compliance –** BHCC complete a PSN assessment on an annual basis in order to be able to send and receive information over the Public Services Network. This assessment looks at the type of infrastructure used to connect to the network and outlines the Information Assurance (IA) requirements and commitments we need to meet.
- **OHMs System Re-procurement -** BHCC are looking to re-procure our Social Care and Housing systems. The capabilities acquired through this project will contribute to data quality and management of risk in both procurements.
- **Corporate Strategy -** The corporate strategy involves devolution of services in response to budgetary pressures. The information management capabilities acquired through this project will support safe data transfer in the context of these projects.

The project team are proposing the following options:
Option 1: Do Nothing
Use existing resource to implement the plan

Option 2: Hub and Spoke:
Project Management resource and legislation/analysis expertise will reside in the corporate centre (Legal, PIP and ICT), while information asset expertise within each service will carry out analysis and recommend/carry out the required changes within services, while locally, experts in the business processes and use of information will

liaise with the central resource whenever business changes impact on how personal information is to be kept or used.
The project will seek opportunities to share tools and techniques (and potentially resources) with partner organisations such as Orbis. It is not anticipated that external consultancy will be required.

Option 3: Centralised model:
Create a small team within IT&D both to address the initial project but hold responsibility for functional compliance with the GDPR on an ongoing basis.

4. Preferred Option

Indicate which is the preferred option of those described

Option 2 is the recommended option on the basis that it best balances the risks and costs of compliance with the forthcoming regulation and fits with the existing information governance strategic approach.

OPTION 2

1. Description of the option

Describe the option that is being explored. Including any evidence base, this should include benchmarking data and needs analysis undertaken.

The preferred option is to implement and develop an Information Asset Framework. There will be 6 stages to the successful implementation of the framework.

1) **Scoping** – looking at how many Information Asset Administrators are needed and how much information within each service area in order to undertake Stage 2.
2) **Data Discovery** – conducting information audits across each service area and documenting with Information Asset Register.
3) **Data Minimisation –** looking at what data should be held, clearing duplications of data, categorising information and linking in with Information Risk Register and Corporate Risk Register.
4) **GDPR Requirements –** ensuring all information and information assets are compliant with legislation, including implementing consent models, system re-procurement, legal basis for processing data, data privacy impact assessments etc.
5) **Data Utilisation –** exploring ways of utilising information held and adding benefits to business units within the organisation to better deliver services as per Corporate Plan and Principles.
6) **Maintenance and Support –** establish a community of practice amongst Information Asset Owners and Information Asset Administrators to ensure data is kept up to date; ensure consistent efficient processing, pool knowledge.

There is a need for a small co-ordinating team of IG experts in the corporate centre linking with business process/business information experts in services. It is anticipated that the staff within services areas could be moved into permanent 'information asset officer' roles with responsibility for information management and information governance within their service areas (including. data quality, FOI, open data, retention scheduling, and information handling training).

The preference is for deployment of existing staff with local knowledge to ensure data discovery work can be completed at the earliest convenience. By employing externally BHCC runs the risk of delayed actions due to induction, rapport building and local training. Existing members of staff would be beneficial as they will already have operational knowledge and have already established rapport with relevant colleagues, departments and

provider services if any.

2. Is this the preferred option?

Yes or no and a brief explanation why.

Yes.

Option 2 is in line with best practice requirements and is being adopted by our Orbis partner authorities, East Sussex County Council and Surrey County Council. Joint working includes:

- IG leads that meet on a regular basis
- Sharing of templates and documentation including privacy impact assessments
- Aligned contract agreements and procurement
- Communications and awareness initiatives

Other similar local authorities have adopted the Information Asset Framework approach and have robust models that are published for other to benchmark against.

Reasons for not choosing other options

Option 1 has legal implications which cannot be ignored. Selecting this option would inevitably place the LA on the radar of the Information Commissioner which has the power to levy fines and issue 'Stop Orders' which have the potential to undermine the day to day operations of the Council. In addition, the Council would expose itself to heightened risk of civil litigation.

Option 3 will isolate the work stream to the IT&D service area and put constraints on budget, resource and capacity. It can also be reasonably expected to impact negatively on the quality of deliverables, with the potential to undermine both Data Protection rights and quality of business processes, The GDPR impacts across ALL service areas. IT& D do not have knowledge or capacity to take on such a large corporate project in an organisation so functionally diverse.

3. Cashable benefits

What are the anticipated financial savings from the programme or project? Profile the savings over the lifetime of the programme or project.

There will be no immediate savings from this project.

Legislative Requirement

Implementation and delivery of this project is a legislative requirement and cannot be avoided.

Cost Avoidance

This project should mitigate the risk and exposure of fines due to breach of information law, reduce the risk of reputational damage and reduce the risk of monitoring by the supervisory authority, Information Commissioner's Office.

Example: http://www.itpro.co.uk/public-sector/24654/local-authorities-stung-by-hundreds-of-data-breaches-reveals-foi

However, ultimately through a co-delivery approach greater pool of IG knowledge and experience leading to an improved approach to Information Management and IG there are a number of benefits associated.

In long term, there are anticipated savings around the need for publication which should arise from information audits. We will be able to identify what information we hold and be able to provide it to the public. This process is currently dealt through FOI Requests. In

December 2016, an analysis was undertaken by the IG Team on ICT FOI Requests as demonstrated in **Appendix B**.

Over time, as digital by design and privacy by design are embedded in all relevant Council processes, there will be benefits in terms of reduced opportunity costs, which will be realised through streamlined ICT infrastructure, lower support costs and reduced duplication of effort.

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4. Non-cashable benefits

Every non-cashable benefit (or improvement) should be expressed in measurable terms, and the current situation understood and baselined before the programme or project is implemented. Include benefits from the perspective of the customer

Current situation	*Benefit expected*	*Measured outcome that you hope to achieve*	*How will the benefit be measured?*
Complaints with Information Commissioner 40% higher than 2015/16	• Improved citizen trust • Decline in complaints to ICO, freeing up capacity in the team • Keeps us off the radar of the ICO for enforcement action and fines	• Decline in complaints made to the supervisory body. • Increased capacity within Data Protection Team for training and other workflows	• IG Team report statistics and KPIs to the Information Governance Board • Measurement against the Information Governance Strategy 2016 - 2018
Weak Data Analysis	• Data analysis can be used to make forecasts and identify trends and patterns. This is great for the progress of the business in terms of profit as data analysis could lead to new marketing processes or other business decisions.	• Efficient processing of data • *Reductions in redundant, obsolete, trivial data with corresponding reductions in software and hardware costs*	• Regular compliance monitoring in information management • IG Team report statistics and KPIs to the Information Governance Board • Software licensing fees will decrease • Internal Audit
Weak Incident Management Processes	• Reduced Cost • Increased awareness across organisation • We are able to mitigate risks easily • Reduce risk of compensation for data breaches	• Greater staff awareness around reporting incidents • Wider support and knowledge around risks • Learning from incidents flows through to best business practice	• Decrease in incidents • Improvements in operational processes • Ability to strategically prioritise vulnerabilities arising from incidents
Privacy Impact Assessments are not a part of the current Change Management Process	• Ensuring privacy by default • Ensures that providers are compliant with best practice • We are able to identify new collection of data and the legal basis for doing so • Mitigates risk of weak information security controls where the Council is the data controller.	• *Due diligence within projects for personal data* • *Reductions in redundant, obsolete, trivial data with corresponding reductions in software and hardware costs*	• Improved certainty of due diligence with suppliers • Policy and procedures adhered to thus providing legal coverage • Internal Audit
Lack of understanding around information held within service areas	• Able to offer and deliver better services to citizens • Able to publish information which would increase FOI requests and save costs.	• Reductions in redundant, obsolete, trivial data with corresponding reductions in software and hardware costs • Greater knowledge and support offers to the Public and internal officers.	• Regular reviews of Information Asset Framework • Performance KPIs for individual service areas • Decrease in elapsed man hours for FOIs which are published • Greater uptake of service by the Public
Data is held for longer than legally allowed	• We are not holding data for no reason • We are complying with legislation	• Reductions in redundant, obsolete, trivial data with corresponding reductions in software and hardware costs	• Annual destruction figures go down • Cost savings for storage and disclosures • System reporting on retention
Limited knowledge of the legal bases for processing information	• Data is processed and managed appropriately under Information Law • Mitigation of Enforcement action for inappropriate processing	Staff are better able to communicate to the public how and why information is collected and processed	• Reduction of complaints • Internal Audit
No current framework for Information Asset Management	• Accountability for information assets across service areas • Compliance activities relevant to assets are factored into	• Assets are well managed in compliance with information rights and strategy.	• Compliance reporting and performance reviews with IAOs and IAAs • Community of Practice

	operational BAU activities, process design and policy. • Provides ownership of information risk and controls	• Information Assets are easily identifiable to the business	• High quality service to internal and external customers
No current guidance and processes around Information Sharing with partner organisations and suppliers	• Appropriate and legal agreements with partner organisations • Ownership of liability of data breaches • Ownership of subject access request processes • Knowledge of access control that falls outside of the Council • Information Sharing workflows to help people understand whether they need an agreement	• Compliance with information law • Greater knowledge of who has access to information we collect • Greater powers to enforce requirements upon processors • Improved contract management/ supply chain management	• Internal Audit • Contracts Management • Reduced information sharing queries to IG Team thus giving capacity to team
Current poor public reputation for not being transparent with information	• In line with the Local Transparency Code of Practice • Supportive of Freedom of Information Act ; • Publishing shows transparency • Compliance with reuse of public sector information regulations 2015	• Citizen trust • Wider data control for the public • Compliance	• Decrease in Freedom of Information Requests • Decrease in Complaints to BHCC • Decrease in complaints from Information Commissioner Office

5. Costs (capital and revenue)

	Year 1	***Year 2***	***Year 3***	***Year 4***	***Total***
Capital costs					
Necessary compliance updates to existing software packages in council services	**£100,000**	None	None	None	**£100,000**
Contents Analytics (Software and Services)	**£100,000**	None	None	None	**£100,000**
Appropriate training materials and delivery tool	**£18,000** for training each IAA and IAO (45 people at £400 each) **£26,000** for micro-event training tool Also a need for new LMS (separate discussions to be held with key stakeholders)	No costs for core training as will integrate into modules within our own LMS system.	No costs for core training as will integrate into modules within our own LMS system	No costs for core training as will integrate into modules within our own LMS system	**£44,000**
In service backfill/fixed term contract posts to support initial compliance implementation within services	**£170,000**	**£92,500**	None Roles transfer to Business as usual within services	None	**£262,500**
Project Management, initial legal and procurement support, Information Governance and analysis support for implementation.	**£120,000**	**£17,500**	None	None	**£137,500**
Total Capital costs	**£534,000**	**£110,000**	**0**	**0**	**£644,000**

Revenue costs					
Contents Analytics (Software and Services)		**£60,000** Software Support	**£60,000** Software Support	**£60,000** Software Support	**180,000**
Ongoing legal Lawyer 0.5 FTE at M9		**£30,000**	**£30,000**	**£30,000**	**£90,000**
Total Revenue:		**£90,000**	**£90,000**	**£90,000**	**£270,000**

6. Funding

Have the budgets to fund the programme or project been identified? Specify which budgets.

n/a

Will the programme or project be in receipt of any funding? Profile the funding over the lifetime of the programme or project.

	Year 1	***Year 2***	***Year 3***	***Year 4***	***Total***
n/a					

Please identify the funding source(s)

n/a

7. Resources

What staffing resources are required to deliver the programme or project?

Service	***Why are they required?***	***Quantify the requirement (fte)***	***When are they required?***	***Has the service been consulted and what did they say?***	***Are the staff available?***
Operational staff	To deliver project across individual service areas	Up to 30 FTE staff (including parts of existing staff's remits)	Deploy IAA's in October 2017	Already engaged	TBC
Communications	To help promote & publicise legislative changes	TBC	ASAP	Not yet	TBC
Finance	not likely to be required	n/a	n/a	n/a	n/a
Human Resources & Organisational Development	Ensure information roles are established and written into JDs/ contracts	n/a	By September 2017	TBC	TBC
ICT	Software redevelopment and contents analytics	3 FTE Staff	ASAP	Already engaged	TBC
Internal Audit	not likely to be required	n/a	n/a	n/a	n/a
International Team (knowledge of funding opportunities)	not likely to be required	n/a	n/a	n/a	n/a
Legal & Democratic Services	Lawyer	0.5 FTE	ASAP	Already engaged	TBC
Performance, Improvement & Programmes	To help form initial project group, project plan and help with business cases	1 FTE for 6 months	Already involved	Already engaged	Yes?
Policy, Communities & Equalities	not likely to be required	n/a	n/a	n/a	n/a
Procurement	To procure products and services, but this is likely to be under engagement	1 FTE post	September 2017	Already engaged. Agreed need for FTE post for training contract	TBC

	thresholds			managers and procurement processes in line with GDPR	
Property & Design	not likely to be required	n/a	n/a	n/a	n/a
Sustainability	not likely to be required	n/a	n/a	n/a	n/a

Are any specialist skills required to deliver the programme or project (beyond those identified above)? If so, how will these be acquired?

- Existing IG resource within the IT&D IG team

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8. Risks and opportunities

Assess the risks and opportunities associated with the programme or project by using the council's Risk Management Framework and risk register template. List the most significant risks in the table below and the initial mitigating actions.

Risk description	*Potential consequences*	*Likelihood*	*Impact*	*Likelihood x Impact*	*Mitigating controls and actions*
Tougher penalties and fines and associated costs.	• The cost of an attack on an organisation can have significant impact in addition to any regulatory action or immediate network issues. • GDPR carry fines of up to €20M or up to 4 per cent of total global revenue of the preceding year, whichever is greater. • Cost of brand and reputational damage post attack	3	3	9	- Information Security Incident Reporting and Management Process will enable risks to be tracked, understood and treated. - Establishment of an Information Asset Framework will reduce the amount of redundant, obsolete and trivial data held by the organisation. This will reduce the risk footprint associated with a use of incomplete or inaccurate data. - Training of IAAs, IAOs, and all staff will improve information handling, reducing the chances of an impact on a citizen arising out of a data breach and any associated loss of trust in the Council.
Increased Complaints and Breaches	• Reputational Damage • Cost Avoidance of staff hours spent on complaints • Threat of being placed into special measures by the regulator (ICO)	4	3	12	- Improvements to data quality, supporting improved customer experiences and developing trust with residents. - Ability to monitor data quality and transactions will reduce the amount of negative resident interactions which result in ICO reports.
Data Privacy Impact Assessment and Privacy by Design (Article 20)	• Processing activities that rely on new technology are more likely to result in a high risk for the rights and freedoms of individuals • Large costs to re-procure and modify systems • Loss of public trust due to lack of due diligence, resulting in increased cost of service delivery.	5	4	20	- Assessing at the earliest convenience privacy risk to personal data used for processing activities across the business. - Privacy Risk Assessments enable to the organisation to mitigate information risk at the earliest convenience allows risks to be identified and treated early and reduces the likelihood of dead ends. - The ability to produce DPIAs when challenged reduces the amount of time and cost in responding to public and ICO complaints.
Lack of ability to exercise	• Discrimination, identify theft, fraud, financial loss, damage to reputation, loss of	4	3	12	- Improved rapport between the Council and citizens

information rights for data subjects	confidentiality, reversal of pseudonymization, significant economic social disadvantage, threat to life and safety.				concerning data rights and data usage, leading to a reduction in complaints. - Improved information management producing the ability to evidence decisions and actions, resulting in public transparency
Lack of Understanding and Awareness and Training	• Staff not competent to comply with individual rights under GDPR • Misused information and information sent in error • Inefficient processing • The need for Privacy Impact Assessments is not well understood • Risk that Information Asset Ownership is not adequately adopted	5	4	20	- Training and awareness improves capabilities around data handling, data quality, transfer etc. - Identification of authentic single sources of content improves the ability to collaborate and enhances efficiencies. - PIAs built into processes for business changes, system change, procurement and partnership working. Staff awareness campaign ensures that these are used. - Development of policy, process and training for the IG framework equips relevant officers to perform these roles.
Subject Access Requests	• Failure to comply with new 30 day statutory time limits for completing SARs, exposing the Council to monetary Penalties	5	4	20	- Deployment of i-casework solution to reduce the administrative overhead of SAR processing and enable request tracking.
Lack of ability to record and prove we have obtained informed Consent for Children	• Risk of escalation to the Information Commissioners Office.	2	2	4	- Business Improvement review of Children's Services SARs resulting in recommendations for improvements to process and to support from the central IG Team, will help to ensure that the subject access rights of children are adhered to.
Consent (lack of ways to evidence explicit consent and withdraw of that consent)	• Inappropriate and unlawful processing of personal data • Inability to prove consent based processing is lawful • Non compliance with GDPR (Articles 18 – 21) • Likely compensation for complaints	4	3	12	- The creation of a corporate golden record for residents by DF will give visability on consents provided by them. - Consent flagging within core systems will prompt staff to obtain informed consents in a timely manner, thus reducing the cost and effort of complaints handling.
Incident Management (Lack of process and performance	• Lack of flow from incident lessons to service improvements resulting in continuous bad practice • Similar patterns of breaches becoming of attention to the ICO.	4	4	16	- Propagation of incident management capability within the wider organisation will allow incidents to be resolved and learning

KPIs for IG service)					absorbed more quickly.
Legal Basis for Processing Data	• Risk of unlawfully storing or using data • Unable to demonstrate where data is legally processed	2	2	4	- Data discovery exercise allows us to identify information held, legal basis for processing and ensure that new data purposes are subject to adequate controls.
Lack of mature Information Asset Framework and Information Asset Ownership	• No accountability for assets • Not currently a responsibility under JD's • No up to date data flow mapping • Unclear escalation paths for breaches within service areas linking with IG Team • We hold a lot of obsolete, redundant and inadequate data • Annual Destruction not complied with	5	3	15	- Implementation of Information Asset Framework with added accountability to GDPR Programme Board and Community of Practice allowing a business as usual model to monitor performance of IAO area which allows the organisation to identify gaps in controls.

9. Outline programme or project plan
Indicate the timeline for the programme or project with key milestones, including when decisions are needed and by whom, and deliverables.

An Information Governance Projects Timeline is provided in **Appendix A**.

10. Stakeholder consultation
List any consultations with stakeholders and the findings. Examples of stakeholders include citizens, staff, partner organisations, Members.

Citizens - Citizens will need to be informed of their new rights under EU GDPR. Articles 15 - 22 states that we should inform data subjects of their individual rights and ensure they are given appropriate methods for exercising these. Article 12(5) of GDPR, states the fee must be scrapped, this might lead to an increase in Subject Access Requests. If we can streamline the process we may be able to reduce the impact of citizens exercising blanket information rights through Subject Access.

Staff – employees are impacted by GDPR as well, we hold a lot of data on employees and their rights must be adhered to. We need to ensure individual staff are compliant and competent across the corporate, to mitigate against incidents, data breaches and misconduct. This is covered by clauses within job descriptions, code of conduct and contracts but needs to be applied on an operational level through appropriate induction materials, ongoing CPD

Partner Organisations – Partner organisations must be engaged. GDPR places specific requirements on data processors as well as controllers. All partner organisations and suppliers must be held to appropriate data quality standards to ensure that individual rights are met within software and systems and the sharing of information across providers.

However, as Data Controller the Council will be primarily responsible for ensuring that only adequate and relevant data is transferred to partner's organisations.

Councillors – As data controllers in their own right, they need to be aware of the implications GDPR has on them. Councillors are sole data controllers for the purposes of constituency business, but also handle data which is under the data control of the Local Authority and the political parties they are aligned with. Accordingly, Councillors will need to be supported in understanding their unique role as data controller and data processor in order to effectively operate as 'middle man' between the Council and the public voice. If done effectively, this should help to improve citizen's trust.

11. Equalities
Has an Equalities Impact Assessment been conducted for the programme or project? Is one required? When will it be undertaken?

We do not believe an Equalities Impact Assessment needs to be conducted for this project. However, there are requirements around rights of data subjects which will require Equality Impact Assessments to be completed whilst during up work processes for dealing with the following:

- Informed consent
- Right to erasure
- Right to object

- Right to restrict processing
- Right to withdraw consent
- Right to rectification

There will be a need for an EIA for informed consent. As we will face issues around informed consent for different groups in the community and this should help us engage the audience with the need for investment.

12. Sustainability

What significant environmental impacts is the project likely to have?
Are there any implications for the local economy and local communities?

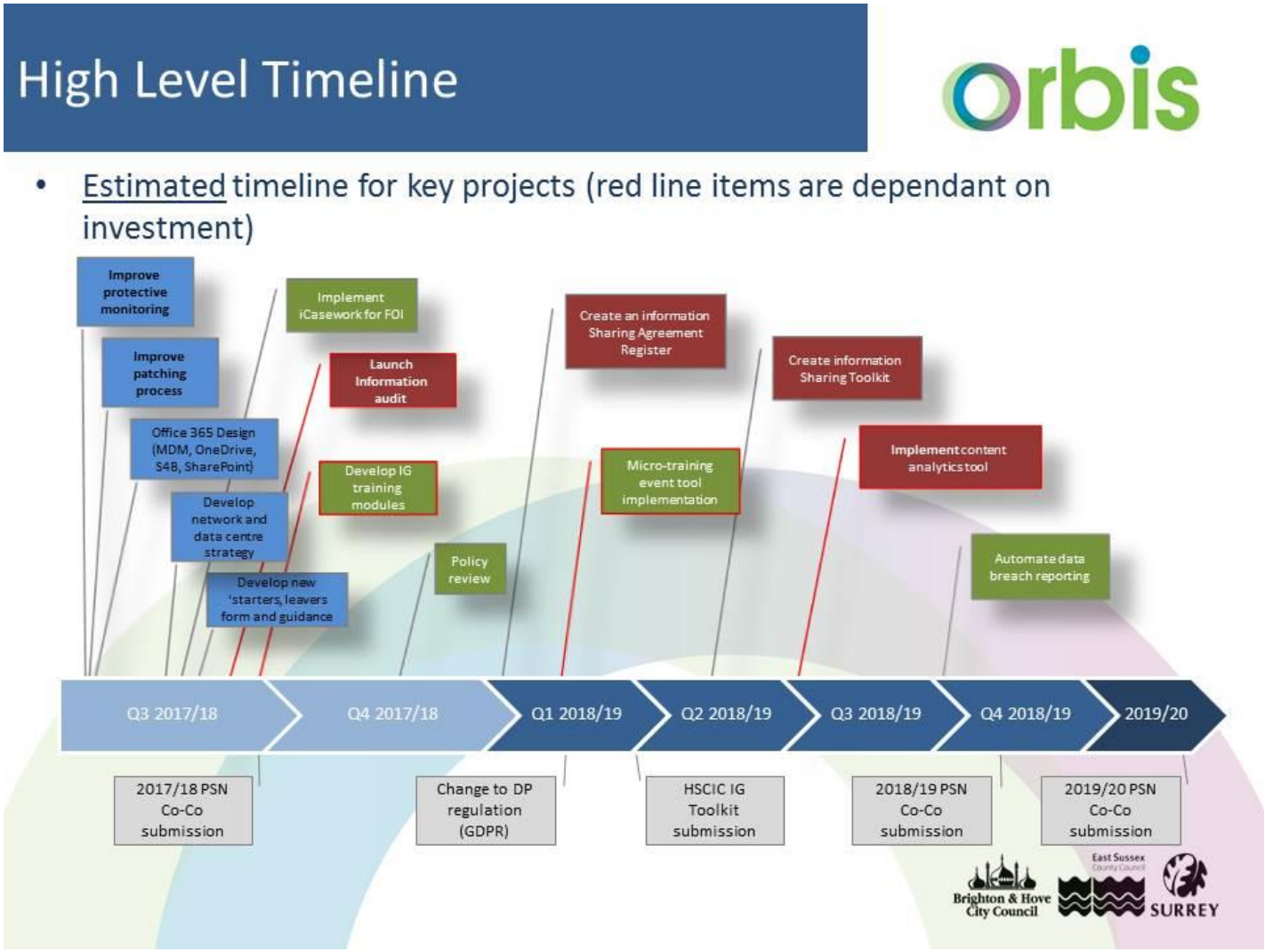
There is no evidence of impact to the local economy or local communities. However, it may be that sustainability of adequate citizen information overtime will be a factor.

Authority to proceed

This business case needs to be approved via the appropriate governance route before the programme or project can be implemented. Please complete the table below to confirm where this authority was obtained. Please ensure the agreement was minuted

Meeting where authority to proceed was obtained	Date of meeting
Corporate Modernisation Delivery Board	11th October 2017

Appendix A: Information Governance Projects Timeline



Appendix B: Process for Freedom of Information Requests: ICT Contracts

Created: 19th October 2016

Resources: Wendy Kassamani
Actual Time: 5 minutes
Processing Time: 1 day

Resources: Anne Cameron
Actual Time: 10 minutes
Processing Time: 1 day

Resources: Anne Cameron
Actual Time: 2 minutes
Processing Time: Same day

Resources: Manager of Team
Time: 3 minutes
Processing Time: 3 days

ICT FOI Request received and allocated → Look up on the register who is responsible → Send FOI to manager to delegate → Manager delegated to member of team → Member of Team looks up contract etc

Resources: Member of Team
Actual Time: 20 minutes
Processing Time: 13 days

Member of Team looks up contract etc → Approval seeked from Mark Watson

Resources: Anne Cameron and Mark Watson
Actual Time: 10 minutes
Processing Time: 3 days

Approval seeked from Mark Watson → Changes to be made to response

Resources: Anne Cameron
Actual Time: 5 minutes

Changes to be made to response → Send FOI to manager to delegate

Approval seeked from Mark Watson → Approved, sent out and completed

<u>Time taken without Contracts Register</u>

Prior to the introduction of the Contracts Register an average ICT Contract Freedom of Information Request would take

Member of staff involved in the response is:

5 members of staff on average

Actual Time: 55 minutes

Processing Time: 21 days or 23 days (with changes)

(NB: this is dependent on individual's workloads)

<u>Time taken with Contracts Register:</u>

Actual Time: 10 minutes

Processing Time: 4 days

<u>Recommendations:</u>

Approval not needed as published information:

Actual Time: 10 minutes

Processing Time: 1 day

ICT FOI Request received and allocated → 5 mins → Link to Contracts Register given as response → 5 mins → Approval seeked from Mark Watson → 3 days → Approval given, sent out and completed

1 day