

<b>Subject</b>	<b>Information Governance Update Report</b>	<b>Status</b>	For Publication
<b>Report to</b>	Local Pension Board	<b>Date</b>	03/11/2022
<b>Report of</b>	Corporate Manager - Governance		
<b>Equality Impact Assessment</b>	Not Required	Attached	Na
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## **1 Purpose of the Report**

- 1.1 To provide members with an update on current information governance activity and to report on a data breach that has been reported to the Information Commissioners Office (ICO), along with the actions taken.
- 1.2 A report will be provided regularly to provide assurance and monitoring of information governance across many areas of the business.

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## **2 Recommendations**

- 2.1 Members are recommended to:
- a. **Note the reportable data breach and actions taken, and consider any further information required from officers.**
  - b. **Note the information governance activity to enhance processes and procedures.**

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## **3 Link to Corporate Objectives**

- 3.1 This report links to the delivery of the following corporate objectives:  
Effective and Transparent Governance
- 3.2 To uphold effective governance always showing prudence and propriety.

## **4 Implications for the Corporate Risk Register**

- 4.1 The contents of this report link to a the risks around Data Protection and regulatory Compliance in the corporate risk register; and set out the actions being taken to mitigate these risks.

## 5 **Background and Options**

- 5.1 Considerable activity has commenced to enhance SYPA information governance. This will include IT and Cyber Security going forward, although this is not reported in this update. The governance team are working with internal audit to enhance processes and procedures throughout the organisation. A focused action tracker has been implemented and agreed with the auditors which scopes those areas that the team will focus on during the remainder of 2022/23 and agreed timeframes for implementation. This action plan is attached at Appendix 1. The internal audit role is to act as a “critical friend” in an advisory capacity as we work on the information governance improvements. A full audit review will be carried out during Q4 of the current year to track progress and provide assurance on the robustness of the controls in this area.
- 5.2 A data breach occurred on 19 September 2022, a bank holiday when the office was closed. The external letter box was tampered with and post stolen and strewn across the path and road outside the building. The documentation retrieved identified 17 data subjects (scheme members) documentation was tampered. Through CCTV footage it is evident that the assailant’s intentions were to seek cash, and therefore the documentation was discarded. It is not known whether any further post was taken from site.
- 5.3 Investigation revealed documentation such as birth certificates, passport numbers and marriage certificates were damaged but not removed from site.
- 5.4 All internal protocols were followed and reported to the Data Protection Officer (Rob Winter – Head of Internal Audit). Whilst the incident was low risk and pertained to a small number of data subjects, the decision was taken by the DPO, Corporate Manager – Governance and the Governance and Risk Officer to report the incident to the ICO.
- 5.5 No communication or recommendations have been received by the ICO to date.
- 5.6 All 17 data subjects have been informed of the data breach and assurance provided that the documentation was retrieved. Each data subject has been informed that any damaged documentation will be replaced and/or costs reimbursed by the Authority. The external letter box was immediately taken out of use and post is now only accepted during office hours when it can be handed to a member of staff.

## 6 **Implications**

- 6.1 The proposals outlined in this report have the following implications:

Financial	Costs of any reimbursement fees to scheme members for replacement documentation will be met from existing budgets.
Human Resources	None
ICT	None
Legal	The data breach was reported to the ICO in line with legal requirements.
Procurement	None

## Corporate Manager - Governance

<b>Background Papers</b>	
<b>Document</b>	<b>Place of Inspection</b>
None	-