Information Assurance

Annual Report 2022/23

Lincolnshire
COUNTY COUNCIL
*Working for a better future*

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Foreword

Information Assurance (IA) is the process of identifying and managing information risk through the application of effective and balanced controls. It supports good governance by implementing a corporate framework which promotes a positive information culture, encourages good practice, and sets out clear responsibilities.

IA is fundamental in meeting our legal and regulatory obligations, by ensuring that information, particularly personal data, is used in a way that is lawful, fair, transparent, and secure.

IA adopt an approach which enables effective service delivery, supports colleagues, and assists information owners to make informed decisions about the information they are responsible for.

It should therefore be seen as a cornerstone of any organisation that relies on information to deliver effective services. This is particularly true of local government, which collects, creates and uses a wide variety of information, some of which is very sensitive.

This annual report summarises key activity undertaken by the IA team during 2022/23 and reflects the output of three core specialist areas delivered by 11 council officers.

Information Security · Records Management · Data Protection
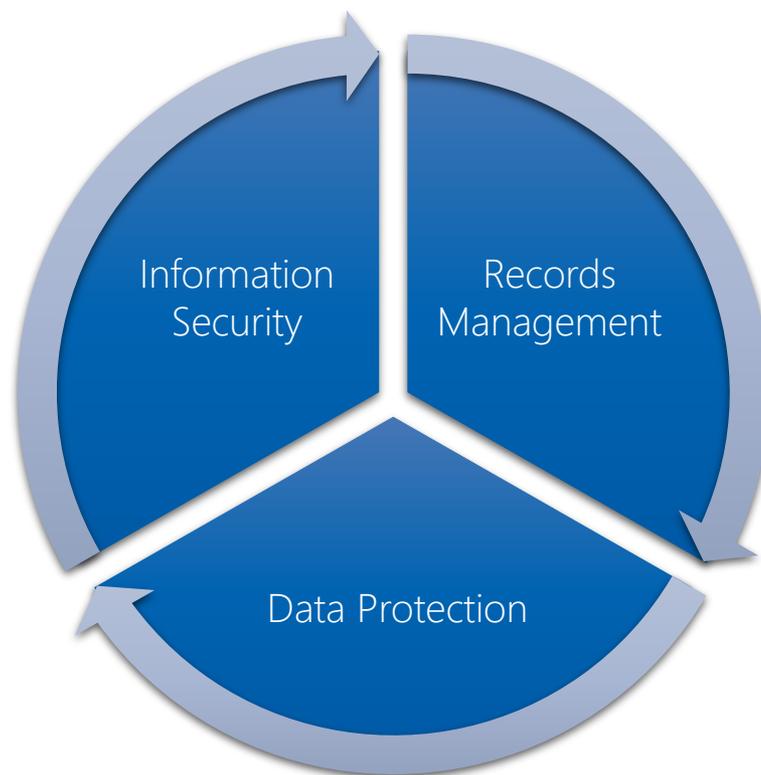
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The demand for IA services throughout the reporting year increased significantly with another year-on-year increase in engagement across all three strands of the service. This has resulted in a record number of requests for IA support and is a key indicator that IA services continue to support, guide and inform colleagues both within, and external to, the council.

High levels of engagement are an important factor in good governance, and this has been maintained because of significant effort to promote the service and to raise awareness of the benefits of good IA. It is also as a result of a pragmatic approach which has at its centre, the needs of the council, and the positive response by colleagues to engage with the team.

In addition to the continuous engagement across all directorates, we have supported successful collaboration with strategic partners including Health, and other local authorities as well as a multitude of other partners and suppliers. This has allowed us to promote good IA and build on already positive relationships.

Cyber Security risks are continuously increasing, and work is ongoing to protect against current and future threats.

While IA is perpetual and risks continued to be identified and managed, the approach shows an effective and meaningful contribution to service delivery and importantly, demonstrates a level of accountability for the information used by colleagues throughout the council.

Five Key Information Assurance Messages

- A successful cyber attack which results in significant negative impact continued to be a significant risk. IA has worked to ensure a high level of awareness is maintained amongst colleagues and we have continually reviewed and developed guidance to reflect the current threat.

- The positive impact of the Corporate Records Management Project continued. It has adapted quickly to respond to previously unknown areas of risk while still delivering on its key objectives. Risk relating to hard copy records continues to fall.

- Despite an increase in the number of security incidents reported to the team, there was a reduction in the number of incidents involving the most sensitive data, and no incidents required onward reporting to the Information Commissioner's Office.

- Except for the ongoing cyber risk, and the risk relating to legacy records, all data protection risks identified and managed by our Data Protection Officer are within tolerance.

- IA has provided the highest level of support ever with a 34% increase in demand for our services. This means even more opportunities to identify and manage information risk.

Data Protection

Continual improvement has been a key driver for activity throughout the year with support and advice made even more accessible and easy to understand. This has directly improved engagement with colleagues and increased requests for support including the identification and resolution of privacy risks, formalisation of information sharing, and responding to project support and assurance needs. We also continued to develop and strengthen our relationships with external partners to support the delivery of key services within Lincolnshire and across neighbouring local authority areas

The Data Protection Advice Service for Schools has delivered effectively, and building on an already first-class service, has developed additional content and delivery mechanisms to help schools, who have signed up to the service, to meet their data protection obligations.

Confidence levels across corporate controls are high and risks are being effectively managed.

Key Headlines

- Six complaints were referred to the Information Commissioners Office (ICO) by members of the public. One complaint was partially upheld which was as due to an individual not receiving a response to their request within the statutory timescale.

- 24 data protection infringements, which excludes data breaches, were investigated by the council's Data Protection Officer. Six were upheld which consisted of three relating to individual rights requests; two concerning inappropriate sharing/disclosure of personal data; and one relating to incorrect privacy information.

- We have provided more support than ever before including to the Homes for Ukraine Sponsorship Scheme, the Greater Lincolnshire Public Health Partnership, the Child Protection Information Sharing programme, and Integrated Care System partnership.

- We ensured a dramatically improved response to the Local Authority Survey issued by the Office of the Biometrics and Surveillance Camera Commissioner with a level of detail drawn from remediation work designed to tackle historic challenges.

Future focus

- Ensuring impending changes to UK data protection legislation are introduced with minimal fuss.

- Improving the knowledge of Information Asset Owners in areas such as information sharing, data breaches and risk assessments.

- Continuing to develop and strengthen our relationships with partners to support the delivery of key services within Lincolnshire and across neighbouring local authority areas.

In addition to the many hundreds of "simple" support requests, **234** tasks required extended, more complex support. The spread of activity:

- **32%** Resources
- **23%** Adults and Community Wellbeing
- **4%** Other
- **3%** Fire and Rescue

23% Children's Services

10% Place

4% Corporate

34% increase in requests for extended IA support.
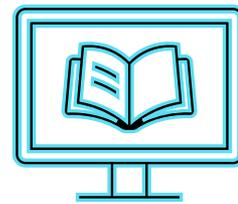
92% of staff completed IA e-learning.

**24** data protection infringements (which excludes data breaches) investigated by our Data Protection Officer.

of these → **6** were upheld, **2** partially upheld, **13** not upheld with **3** ongoing.

including ↓

6 which were initiated by complaints to the ICO by members of the public. A 20% increase on the previous year.
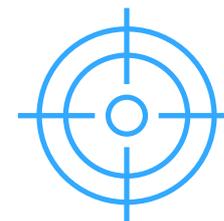
of these → **1** partially upheld, **3** not upheld, and **2** which didn't meet the threshold for investigation by the ICO.

Records Management

The identification and appraisal of unmanaged hard copy records across the estate remained a priority. Project pace has been consistently good with targets achieved. The output has increased over the previous reporting year, reflecting the hard work of the project team. This has resulted in a project total of 93K files being subject to improved governance with almost 20% of these securely destroyed. Consequently, risk continues to fall in this area.

Alongside planned project work we have ensured resource was available to engage with key stakeholders in support of wider records management support, including the management of electronic records. This included providing support and risk management advice to the owners of both new and current systems.

Key Headlines

- Knowledge and awareness of corporate records management requirements has continued to grow across the council with improved engagement and support. Records management is now part of the corporate conversation.

- All applicable main campus basements cleared of legacy and uncontrolled records and repurposed back to Corporate Property; successful clearance of eight office buildings of paper records in collaboration with Smarter working.

- Ad hoc support provided to a diverse set of service areas including Children's Residential Homes, Care Homes, and Day Centres resulting in almost instant risk reduction across these sites.

- Improved management information to give accurate and up to date progress across the records management project.

- Initiated data interrogation of records stored with our offsite supplier with a focus on reducing our holdings; this activity has already identified areas which require attention.

Future Focus

- Supporting colleagues to develop and establish fundamental changes within our digital record and information keeping environment.

- Reducing the number of hardcopy records stored and sent offsite to improve efficiency and long-term cost reduction and while responding to areas of high risk in a timely manner.

- Assisting information owners to improve visibility of their own records to ensure continued risk reduction.

Of which **67K** were indexed and retained

Of which **18K** were corporate files

A project total of over **93k** hard copy records identified and appraised

Of which **26K** were destroyed

Of which **10K** related to HR

Of which **58K** were client files
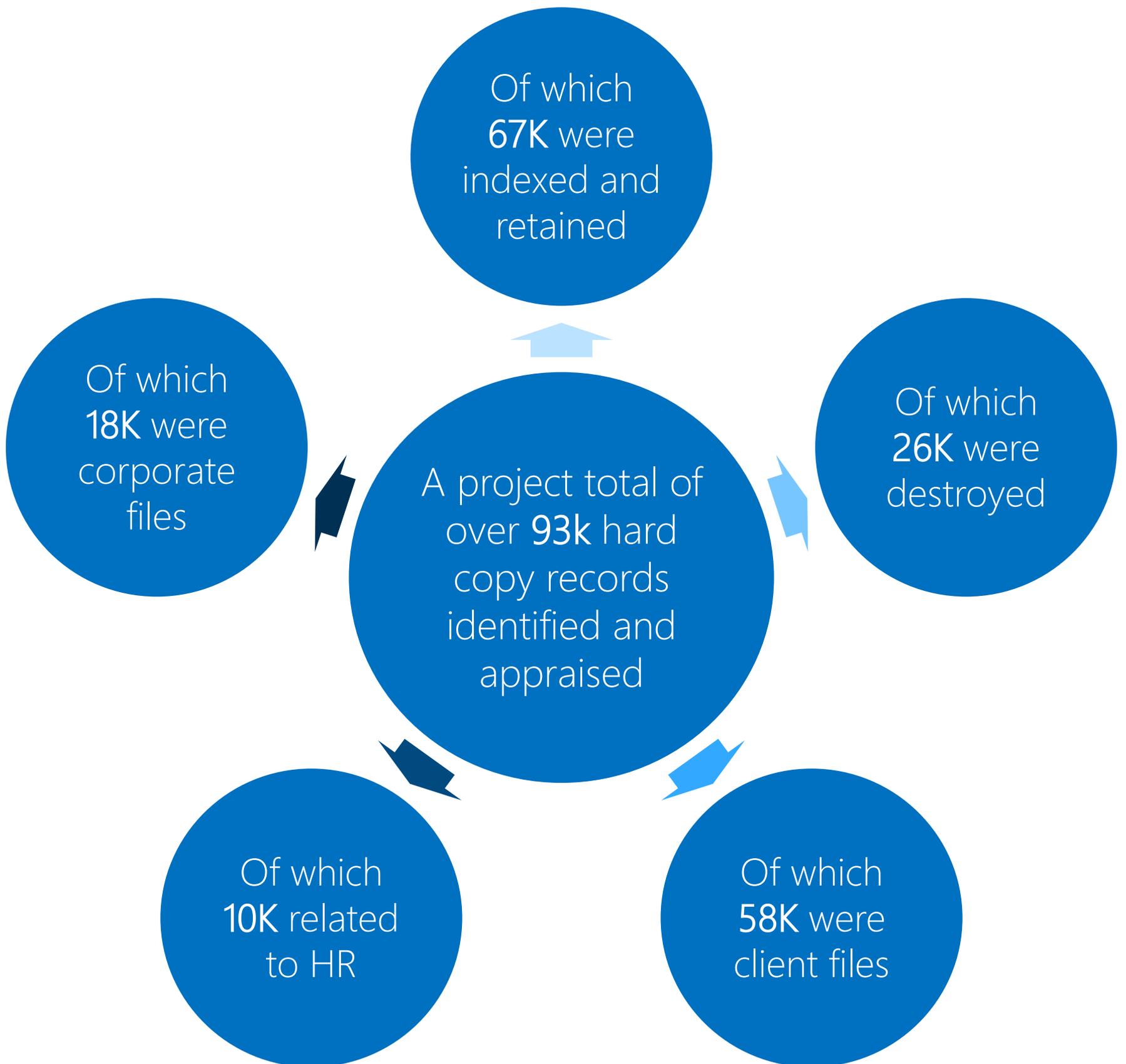
Summary

The cybercriminal economy continued to evolve with Ransomware attacks becoming even more impactful; the threat from cyber attackers continued to present challenge. In response we ensured our guidance, advice, and awareness remained relevant to the threat posed.

Separately, organisational security incidents, which includes data breaches, have risen in comparison to the previous year however incidents involving the most sensitive data have reduced. While any security incident is regrettable the numbers represents a tiny fraction of information transactions undertaken to conduct council business. Colleagues have continued to be open and transparent in their reporting allowing all reported incidents to be investigated and subject to proper impact analysis thus ensuring an appropriate response and reducing the need for onward reporting to the Information Commissioners Office.

Security assurance activity was adjusted in line with new guidance issued by the National Cyber Security Centre, and we continued to support pragmatic risk management across new systems and processes. This has resulted in providing a level of confidence to Information Owners which, in turn, helps to improve service delivery.

Key Headlines

- Despite an increase in the number of confirmed security incidents no personal data breaches required onward reporting to the Information Commissioners Office.

- The number of security incidents involving the most sensitive information decreased by 30%.

- Two cyber exercises were undertaken to test understanding and assumptions resulting in raised awareness of the risk, and areas of positive learning.

- Serco, with our continued support, achieved independent recertification to ISO 27001:2013, Information Security Management Systems which is now valid until 2025.

- Information sharing and intelligence channels were improved to help enhance our visibility of new and developing cyber risks.

Future Focus

- Keeping pace with the cyber threat and ensuring ongoing organisational awareness of the risks remains relevant.

- Increased assurance requirements as the use and complexity of Cloud technology increases.

- Ensuring a pragmatic and balanced approach to security while supporting the diverse needs of the council.

Information Security – Key Data

Cyber Attack Prevention

Over 87K critical and high security events blocked on our network perimeter

More than 66K malicious emails blocked including nearly 64K phishing emails

Over ½ **million** internet threats blocked

More than **6000** security fixes applied

Security Incidents (including Data Breaches)
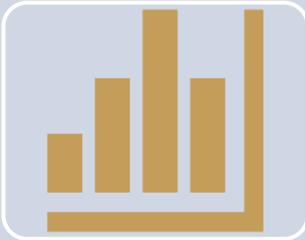
333	**297**	**84%**	**84%**	**64%**
security incidents reported and investigated	confirmed security incidents	caused by human error	involving personal data	due to misdirected information
An increase of **10%**	An increase of **13%**			
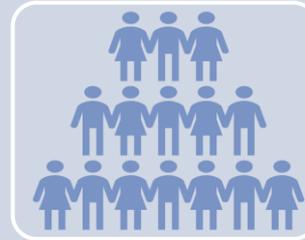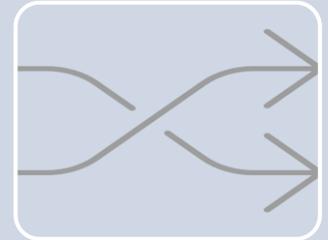
Risk	Raw rating	Current rating	Target rating	Risk status
There is a risk of a successful cyber attack against the council which will have a significant or critical negative impact. Note: IA provide the organisational response while the technical response is provided by IT.	16	12	8	Open
There is a risk that the council's legal obligations and service delivery requirements are not being met because of an inconsistent and fragmented approach to the management of records which will lead to: action by the Information Commissioners Office and/or large-scale undermining of individual rights	12	9	6	Open
There is a risk that that the council is unable to meet the requirements of the Data Protection Act 2018 and UK GDPR leading to action by the Information Commissioners Office or large-scale undermining of individual rights	9	6	6	Monitored
There is a risk that security incidents go unreported or are subject to delay and as a result the council cannot respond effectively and in a way which minimizes impact and meets data protection reporting obligations.	9	6	6	Monitored
There is a risk that colleagues lack awareness of their individual information responsibilities and obligations resulting in an organisational culture that fails to take information assurance seriously.	12	6	6	Monitored

Likelihood				
4 Almost certain	4	8	12	16
3 Probable	3	6	9	12
2 Possible	2	4	6	8
1 Hardly ever	1	2	3	4
Impact	1 Negligible	2 Minor	3 Major	4 Critical

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