



Shared Service:

Information Governance

Shared service commenced:

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Author:

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Overview of the shared service arrangement:

The Information Governance Shared Services is currently included as part of the Legal shared Service between Medway Council and Gravesham Borough Council; the Legal Shared Service was established in April 2017, with arrangements amended in July 2018 to respond to the implementation of the General Data Protection Regulations (GDPR) and enable both authorities to benefit from all resources within the Information Governance (IG) Team (6FTE at that time).

The Shared Service Agreement sets the basis for splitting the available resources between the two councils as approximately 59% for Medway and 41% for Gravesham.

The team structure of the service is formed of the Information Governance Manager, Senior Information Governance officer, three Information Governance Officers and an Information Governance Apprentice. In recent years the team has experienced a relatively high level of recruitment and retention issues, resulting in the need to make use of temporary staff to maintain service delivery. In July 2023, the Senior Information Governance role was successfully recruited to, and the team structure is currently completed with one Senior Information Governance Officer (permanent), one Information Governance Officer (permanent) and one Information Governance Officer post being filled on a temporary basis.

The projected cost of the service to Gravesham Borough Council for 2023/24 is anticipated to be £77,690.

Progress against objectives:

	Objective	Update
1	Efficiency savings. Realising actual financial savings across the two sites but maintaining delivery of the service.	<p>Financial efficiencies were realised at the launch of the shared service, as new requirements introduced at that time would not have been able to be met without the council increasing its resource.</p> <p>In recent years, challenges with recruitment and retention have required reliance on expensive locum staff.</p> <p>Both the IG Manager and Senior IG officer posts have now been filled permanently and action over the course of the next year will ensure that the resources of the team are sufficient to meet the demands of each partner.</p>
2	Added resilience across the two authorities. There will be a larger pool of officers covering both authorities providing additional resilience to cover sickness absence/vacancies or increased workload should this be required	The team continues to provide resilient service, demonstrated by maintenance of service performance despite the recruitment and retention challenges faced. The team are able to provide cover during sickness, annual leave and is able to manage fluctuating workloads.
3	Availability of specialist skills across both authorities leading to increased efficiency; potential for a reduced requirement for external support from contractors etc.	<p>The shared service continues to provide advice and guidance related to the UK GDPR, PECR, Data Protection Act 2018, FOI Act 2000 and EIR 2004.</p> <p>There has been no need to utilise external services to perform Information Governance functions.</p>

	Objective	Update
4	Sharing of best practice in the delivery of services	<p>The team consistently engages with various local IG forums – Kent & Medway Information Sharing partnership, Kent & Medway SIGN groups and other information governance networking groups to gain knowledge and learn from best practice standards in their peer groups.</p> <p>The team also remains updated with the latest releases from the ICO to ensure best practice is embedded into policies and procedures.</p> <p>The ability of the IG Team to work across the two councils provides a strong basis from which to identify and develop best practice and share this between the two partner organisations.</p>
5	Expansion of knowledge base of individual officers	<p>The Data Protection Officer and IG Manager each hold a Practitioner Certificate in Data Protection qualification (PC.dp).</p> <p>The Senior IG Officer holds a degree in law and has completed a data protection qualification from BCS.</p> <p>The PC.dp qualification is part of the team's workforce development plan. IG staff's Personal Development Review are used to highlight any new or refresher data protection training.</p>

Key Performance Measures:

		Target 2022-23	Outturn 2022-23
1	Freedom of Information Response rate	90%	94%
2	Subject Access Request response rate	90%	90%
3	% of Breaches/Incident dealt within 72 hours after IG team becomes aware	100%	100%

Update against recommendations identified in previous year review:

	Objective	Update
1	A review of Information Governance arrangements at each council is to be conducted to determine targeted areas of activity for the Shared Service in the forthcoming period. This review to be used to reset the objectives of the Shared Service moving forwards.	This work is ongoing and scheduled to be completed during 2024.
2	Following the completion of action one, a full review is to be completed of Shared Service resourcing to ensure this remains fit for purpose and is sufficiently skilled to be able to respond to the needs of each authority.	This work is ongoing and scheduled to be completed during 2024.
3	Development of a shared service agreement specifically for Information Governance, which will stipulate expected service levels for each council alongside agreed mechanisms and measures for managing service performance, demonstrating value for money and ensuring the equitable allocation of costs between each council.	This work is ongoing and scheduled to be completed during 2024.

Recommendations/Service Improvements for the coming year:

1	To review the team structure, ensuring continued resilience of the service and creating better opportunities for progression in the service.
2	To move to a position where all IG posts are recruited to on a permanent basis to reduce reliance on locums and temporary staff.
3	To develop the training and support programme delivered through the team to staff members as a contribution to maintaining each council's data protection and data security environment; to include a training & awareness programme on conducting Impact Assessments to ensure all new initiatives, projects and programmes involve the Information Governance team in the formulation of a Data Privacy Impact Assessment (DPIA).
4	To development a shared service agreement specifically for Information Governance, which will stipulate expected service levels for each council alongside agreed mechanisms and measures for managing service performance, demonstrating value for money and ensuring the equitable allocation of costs between each council.

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