

Assurance Map

Data & Insights

Cluster Risk Register Risk:

1. **Information Governance** - Risk that the Council's Information Governance Framework (people and behaviour, process and system, adapting and learning) is not sufficiently robust to ensure that council information and data is processed in a way which: i. mitigates potential harm to the rights and freedoms of data subjects arising from data processing ii. meets the Council's operational, strategic and accountability requirements (business and statutory); iii. demonstrates proper stewardship to deliver outcomes for our people, place and economy.

<p align="center">First Line of Defence (Do-ers)</p>	<p align="center">Second Line of Defence (Helpers)</p>	<p align="center">Third Line of Defence (Checkers)</p>
<ul style="list-style-type: none"> • Trained and qualified staff • Operational procedures and guidance notes, including consistent corporate processes for: <ul style="list-style-type: none"> - Data Protection Impact Assessment - Privacy notices - Data Protection Rights Requests - Incident reporting and handling - Information Sharing Agreement and contractual arrangements - Maintaining the Council's records of processing activities (Information Asset Register) • Records Retention and Disposal Schedule • Mandatory Information Governance Staff Training • Clear and consistent roles and responsibilities in relation to data and information in Corporate Policy and supporting Handbooks of procedures 	<ul style="list-style-type: none"> • CMT Boards • Council Committees • Effective Information Governance / DPO advice and support • Information Governance Group led by Senior Information Risk Owner (SIRO) reviews Quarterly Information Governance Assurance reports • Corporate Information Policy • Data Forums • Governance including annual Information Governance Assurance Statement • Internal Information Assets Assurance Cycle • CCTV Assurance Framework 	<ul style="list-style-type: none"> • External scrutiny of Council's arrangements in relation to DP and PRSA in the form of Reports, inspections, and audits from the Information Commissioners Office and the Keeper of the National Records of Scotland • Internal Audit – Commissioning – November 2022