



Information Technology Sub (Finance) Committee

Date: MONDAY, 26 MARCH 2018
Time: 2.15 pm
Venue: COMMITTEE ROOMS - WEST WING, GUILDHALL

Members: Deputy Jamie Ingham Clark (Chairman)
Hugh Morris (Deputy Chairman)
Rehana Ameer
Randall Anderson
Deputy Keith Bottomley
John Chapman
Tim Levene
Jeremy Mayhew
Deputy Robert Merrett
Sylvia Moys
James Tumbridge

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N.B. Part of this meeting could be the subject of audio video recording

**John Barradell
Town Clerk and Chief Executive**

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES OF THE PREVIOUS MEETING**
To agree the public minutes of the meeting held on 9th February 2018.

For Decision
(Pages 1 - 6)
4. **OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS**
Joint report of the Town Clerk and Chamberlain.

To Follow

For Information
5. **WORK PROGRAMME FOR FUTURE MEETINGS**
Report of The Chamberlain.

For Information
(Pages 7 - 8)
6. **INTRODUCTIONS - NEW IT SENIOR MANAGEMENT TEAM**
Verbal Report of The Chamberlain.

For Information
7. **INTERACTIVE DIGITAL SESSION - IPAD DEMO FROM IT ON HOW TO ACCESS EMAIL, CALENDAR AND ONEDRIVE AND USE OF SHAREPOINT FOR COLLABORATION**
Report of The Chamberlain.

For Information
8. **IT DIVISION UPDATE**
Report of The Chamberlain.

For Information
(Pages 9 - 12)
9. **IT RISKS UPDATE**
Report of The Chamberlain.

For Information
(Pages 13 - 18)

10. **GDPR UPDATE**
Report of The Comptroller and The City Solicitor.
For Information
(Pages 19 - 22)
11. **DATA PROTECTION POLICY**
Report of The Comptroller and The City Solicitor.
For Decision
(Pages 23 - 32)
12. **MEMBER SURVEY**
Verbal Report of The Chamberlain.
For Information
13. **WEB PROJECT UPDATE**
Joint Report of The Chamberlain and The Town Clerk.
For Information
(Pages 33 - 36)
14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
16. **EXCLUSION OF THE PUBLIC**
MOTION - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

17. **NON-PUBLIC MINUTES OF THE PREVIOUS MEETING**
To agree the non-public minutes of the meeting held on 9 February 2018.
For Decision
(Pages 37 - 40)
18. **OUTSTANDING ACTIONS FROM NON-PUBLIC MINUTES OF PREVIOUS MEETINGS**
Joint report of the Town Clerk and Chamberlain.

To Follow

For Information

19. **IT SECURITY UPDATE CR16**
Report of The Director of Information & Chief Information Security Officer.

To Follow

For Information

20. **POLICE IT PROJECTS - UPDATE REPORT**
Report of The Chamberlain.

For Information
(Pages 41 - 44)

21. **PERSONAL ACCESS DEVICE POLICY**
Report of The Chamberlain.

For Decision
(Pages 45 - 56)

22. **EMAIL USE POLICY**
Report of The Comptroller and The City Solicitor.

For Decision
(Pages 57 - 70)

23. **IT OPERATING MODEL AND STRUCTURE CHANGES PROPOSAL**
Report of The Chamberlain.

For Information
(Pages 71 - 92)

24. **TRANSFORMATION - STRATEGIC**
Report of The Chamberlain.

For Information
(Pages 93 - 100)

25. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE
SUB COMMITTEE**

26. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND
WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE
PUBLIC ARE EXCLUDED**

INFORMATION TECHNOLOGY SUB (FINANCE) COMMITTEE

Friday, 9 February 2018

Minutes of the meeting of the Information Technology Sub (Finance) Committee held at Guildhall, EC2 on Friday, 9 February 2018 at 1.45 pm

Present

Members:

Deputy Jamie Ingham Clark (Chairman)
Rehana Ameer
Randall Anderson
Deputy Keith Bottomley
Tim Levene
Jeremy Mayhew
Deputy Robert Merrett
Sylvia Moys
James Tumbridge

Officers:

John Cater	-	Town Clerk's Department
Peter Kane	-	Chamberlain
Sean Green	-	Chamberlain's Department
Matt Gosden	-	Chamberlain's Department
Kevin Mulcahy	-	Chamberlain's Department
Natalie Evans	-	Chamberlain's Department
Melissa Richardson	-	Town Clerk's Department
Gary Brailsford-Hart	-	City of London Police
Philip Saunders	-	Remembrancer's Department

1. **APOLOGIES**

Apologies were received from Hugh Morris and John Chapman.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

3. **MINUTES OF THE PREVIOUS MEETING**

RESOLVED: That the public minutes of the meeting held on 24th November be approved as an accurate record.

4. **OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS**

Members considered a joint report of the Town Clerk and the Chamberlain which provided updates of outstanding actions from previous meetings.

ANPR Outage

The Chamberlain confirmed that the ANPR outage in autumn last year was related to a hardware failure at a third-party provider.

CyberArk

The Chamberlain confirmed that the CyberArk PrivateArk deployment would be complete by April.

Broadband Roll Out

The Chairman highlighted, for Members' information, a letter from the Corporation to Transport for London (TfL) concerning using rail and tube tunnels to facilitate greater broadband coverage in central London.

In answer to a Member's query, the Chamberlain confirmed that in future, the Corporation would make provisions for the inclusion of data sets when drafting contracts with third party broadband providers.

GDPR – Subject Access Requests

The Chamberlain confirmed that subject access requests would be reviewed as a part of a general rationalisation of data forms (this included Privacy Impact Assessments); this was in parallel to the preparation for the introduction of GDPR.

The Chairman emphasised the importance of the Member Development GDPR training sessions with the Comptroller, which are currently taking place. He suggested that all Members of the Sub Committee should attend at least one of these sessions, and that they should thereafter champion the Comptroller's messages to other Members.

RESOLVED – that Members noted the report.

5. **WORK PROGRAMME FOR FUTURE MEETINGS**

Members received a Report of the Chamberlain, concerning the work programme for the next three meetings.

The Chief Information Security Officer & Director of Information offered to bring the "deep dive" report that he has prepared for the Audit & Risk Management Committee to the next meeting of the IT Sub Committee in March.

The Chairman proposed that officers add a separate vertical column on the work programme detailing a "showcase" at each meeting; this would be a technical demonstration of new IT kit (at today's meeting officers provided a demonstration of Skype for Business).

RESOLVED – that Members noted the Report.

6. **IT DIVISION UPDATE**

Members received a Report of the Chamberlain concerning the IT Division.

The Chamberlain began by highlighting the significant steps forward the IT Division had made since this time last year, whilst praising the improvement in

the relationship between the Corporation and Agilisys. The key now was to build on this good work, and for the Corporation has a whole to harness the new IT tools and platforms to ultimately improve performance.

Members were keen to see more on options for the Committee Services team to employ an encrypted email solution when distributing Committee Papers to Members; concerns were raised that the current situation was insecure.

A Member reminded the Committee that adhering to GDPR did not require a secured delivery platform (such as Egress) and it was the responsibility of Members to ensure they were handling information correctly; in response the Chief Information Security Officer & Director of Information stressed that the option of such a platform would be *in addition* to the Corporation's wider efforts to ensure a greater level of cyber security (including GDPR); he emphasised that a key, practical and short term part of these efforts was to finalise a consistent approach to Members' email addresses; once this was completed, the Corporation could then look at employing a secure platform for Committee papers. Furthermore, he confirmed that the Corporation did not currently have an overarching Security Policy.

The Chamberlain confirmed that he would return with a Report on employing a secure platform/Egress at next month's Sub-Committee meeting, this would include more background, future options, and input from relevant departments.

RESOLVED – that Members noted the Report.

7. **IT RISKS UPDATE**

Members received a Report of the Chamberlain concerning the IT Division's risks.

The Chairman was keen that future iterations of the Report should include the implementation of GDPR. He looked forward to seeing the GDPR Update Report at the Sub-Committee's meeting in March.

RESOLVED – that Members noted the Report.

8. **NEW CUSTOMER SATISFACTION MEASURES**

Members received a joint Report of the Chamberlain and Agilisys concerning customer satisfaction measures.

A Member queried the rationale in utilizing the Net Promoter Score (NPS) methodology; officers reassured him that, although the goal was to cut down on bureaucracy, NPS was commonly used across the public sector and would provide robust and easier benchmarking.

RESOLVED – that Members noted the Report.

9. **IT DIVISION - IT SERVICE UPDATE**

Members received a Report of the Chamberlain concerning IT service availability.

RESOLVED – that Members noted the Report.

10. **AGILISYS CONTRACT - RESPONSIBLE PROCUREMENT CHANGES**

Members received a Report of the Chamberlain concerning the Responsible Procurement measures in the Corporation's contract with Agilisys.

Members commended the changes being undertaken, whilst expressing their regret at the reduction in apprentices. The Chamberlain emphasised that the changes were a good news story, the strategy was setting an example for other organisations in both the public and private sectors.

RESOLVED – that Members noted the Report.

11. **RISK MANAGEMENT - COMMITTEE PAPERS**

This subject was addressed in Item 6.

12. **SUB COMMITTEES TERMS OF REFERENCE**

Members received a Report of the Town Clerk concerning the Sub-Committee's Terms of Reference.

Members requested that the Town Clerk ensure the wording aligned with the amended wording in the (Grand) Finance Committee's Terms of Reference document.

RESOLVED – that Members approved the following:

- subject to any comments and agreement, approved the Terms of Reference of the IT Sub Committee for submission to the Court (as a sub set of the Finance Committee Terms of Reference) as set out in the appendix 1;
- considered the frequency of meetings of the Sub-Committee to be adequate; and
- agreed that any changes to the Terms of Reference required in the lead up to the appointment of Committees be delegated to the Town Clerk, in consultation with the Chairman and Deputy Chairman.

13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

There were no questions.

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There was one item of urgent business.

A late report (for information) was received by Members concerning the Data Protection Bill 2017.

A Member emphasised that more work needed to be done on ensuring the guidance on personal liability for Co-optees of the Corporation was more effective.

One Member suggested that officers and Members should keep up-to-date with the Information Commission Office's newsletter, which provided useful updates on GDPR.

RESOLVED – that Members noted the Report.

15. EXCLUSION OF THE PUBLIC

RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

16. NON-PUBLIC MINUTES OF THE PREVIOUS MEETING

The Sub-Committee approved the non-public minutes of the meeting held on 24 November 2017 as an accurate record.

17. OUTSTANDING ACTIONS FROM NON-PUBLIC MINUTES OF PREVIOUS MEETINGS

Members received a Joint Report of the Chamberlain and the Town Clerk.

18. CITY OF LONDON POLICE TELEPHONY GATEWAY PAPER

Members received a Report of the Chamberlain.

19. TRANSFORMATION - STRATEGIC

19.1 Transformation Update (including closedown of Phase 1)

Members received a Report of the Chamberlain.

19.2 City of London and City of London Police - Phase 1 and Phase 2 Strategy

Members received a Report of the Chamberlain.

19.3 IT Strategy Additional Design Principles

Members received a Report of the Chamberlain.

20. IT SECURITY UPDATE

Members received a Report of the Chief Information Security Officer & Director of Information.

21. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

There was one non-public question.

22. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was no other non-public business.

The meeting ended at 3.30 pm

Chairman

**Contact Officer: John Cater
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Forward Plan

Report Title	Report Month	Category	Who
Members Survey Action Plan	May 2018	Operational	MG
IT Change and Engagement Plan	May 2018	Strategic	SC
IT Strategy Update	May 2018	Strategic	KM
CoL IT Roadmap Financials	May 2018	Strategic	KM
CoLP IT Roadmap Financials	May 2018	Strategic	KM
Secure and Collaborative Document Sharing	May 2018	Strategic	SG
CoLP Telephony Gateway Paper	May 2018	Operational	MG
Web Project Update	May 2018	Strategic	BR
Application Rationalisation Roadmap	May 2018	Strategic	KM
GDPR Update	June 2018	Operational	MG
Information Management Findings	July 2018	Strategic	SG
Transformation Gateway Paper	July 2018	Strategic	KM
Information Management Recommendations	July 2018	Strategic	SG
CoLP National and Digital Programmes Update	July 2018	Strategic	KM
Roadmap Plans Review	July 2018	Strategic	KM

Contributors

Sean Green – SG
 Matt Gosden – MG
 Andrew Bishop - AB
 Kevin Mulcahy – KM
 Sam Kay – SM
 Michael Cogher – MC
 Nick Senior – NS
 Gary Brailsford-Hart – GBH

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Committee(s)	Dated:
IT Sub-Committee – For Information	26 th March 2018
Subject: IT Division – IT Director Summary	Public
Report of: The Chamberlain	For Information
Report author: Sean Green, IT Director	

Summary

The IT Division has maintained a focus on service availability whilst seeking to progress the transformation programme that will uplift the overall quality of IT services at the Corporation and City Police. Core updates:

- Performance in City of London Police (CoLP) and City of London Corporation (CoL) was good in February. Customer satisfaction remained high at average 6.61 out of 7 for CoLP and 5.71 out of 7 for CoL.
- IT Transformation Phase 1 desktop transformation has now been completed and handed over to Business as Usual teams in Agilisys and Corporate IT. The Network Transformation programme that was delayed due to a first round failed procurement is on track to complete by the end of May 2018.
- A paper was presented to the Establishment Committee on the 26th February proposing changes to the IT Operating model and structure (IT Operating model proposals signed off by IT Sub-Committee in July 2017). This was agreed by the Establishment Committee. The proposal has now been shared with the staff that work in the IT Division. There is now a 4-week consultation period. If there are no material changes to the proposed structure it is anticipated that the new IT Division structure will be implemented by June 2018. There is a separate agenda paper on this item. Members can be reassured that the same level of service received from the VIP team will remain with the current proposal including a ‘lift and shift’ of the team to the Change and Engagement function.
- The IT infrastructure performed very well with the recent cold spell with over 70% of staff now laptop enabled. Teams were able to continue as normal despite staff living a distance from the office having to work from home for possibly 2-3 days of their normal working week.
- GDPR changes are going to plan (there is a separate agenda item on this subject)
- The extension of the Agilisys contract was agreed by Court of Common Council is being signed by the Chamberlain and the Chief Executive of Agilisys on the 26th March 2018.

Recommendation(s)

Members are asked to:

- *Note the report.*

Main Report

1. Service Experience:

The service performance for both the City of London Corporation and City of London Police was good for the period February 2018.

i) P1 incidents:

- There were no P1 incidents in City of London Police
- There were 2 P1 incidents in City of London
 - a) Issues were experienced with the Corporation's IDox systems and Planning Portal which began on the evening of the 30th January and was finally resolved on evening of Tuesday 13th February. The failure of this system was a consequence of a combination of hardware failure and database corruption. The risk of this occurring again will be mitigated through new Hardware to improve reliability and resilience or moving the application to the Corporation's Infrastructure as a Service facilities hosted by Agilisys. A report on this incident and mitigation of a future incident will be presented to the Planning and Transportation Committee.
 - b) Gower, the Cemeteries booking system server was unavailable for a short period due to an unresponsive server.

IT Transformation Summary

2. The Desktop rollout to the business is now complete with 2527 Windows 10 devices deployed to end users across City of London Corporation.
3. The new Office365 based Intranet went live in February with the solution fully cloud compliant.

4. Server decommissioning has commenced to realise the £420k of savings identified from the Office365 business case.
5. IT Target Operating Model and Policy set are progressing, and management action is in place to limit any impact to the user community during transition.
6. Phase1 Desktop Transformation Closedown activities are now underway, including the completion of closure reports, supporting documentation, and data sets handed over.
7. Police Programme updates are included in the Transformation update report

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Agenda Item 9

Committee(s)	Dated:
IT Sub-Committee – For Information	26 th March 2018
Subject: IT Division Risk Update	Public
Report of: The Chamberlain	For Information
Report author: Samantha Kay – IT Business Manager	

Summary

All IT Risks are now in the Risk Management System, with actions included, for the ongoing improvement and continuing assessment to the Management of Risk within the IT Division.

All the IT risks are now being tracked in the corporate risk management system.

The IT Division currently holds 14 risks, a decrease of one from the previous period. There are currently no RED risks.

One additional risk has been added to the register, two risks have been fully mitigated with risk actions being completed reducing the score to target level. All risks continue to be monitored and reviewed.

There are no extreme impact risks, there are 10 major impact and 4 serious impact risks.

The additional risk covers Transformation Benefits Realisation – ensuring all financial and service-based benefits are achieved.

IT currently hold 2 risks on the Corporate Risk Register, whilst delivering the IT requirements of the IT workstream to mitigate the GDPR Corporate risk which is owned by Michael Cogher, the Comptroller and City Solicitor and the Corporation's Data Protection Officer

Summary of Corporate Risks

- CR 16 – Information Security - Breach of IT Systems resulting in unauthorised access to data by internal or external sources. **Red** moving to Amber in April 18 and Green in July 18 (See separate paper).
- CR 19 – IT Service Provision - For the Corporation, poor performance of IT Service and for the Police critical failure of the Police IT Service. Amber moving to Green in July 18.
- CR-25 – General Data Protection Regulation – The project work is progressing to plan and IT are delivering the GDPR IT Workstream. This should move to green at the end of May 18.

Periodic review meetings are being held with the relevant IT staff to ensure all risks are managed and reviewed in a timely manner.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. Risk remains a key focus for the IT Division and we are continuing to ensure that it drives the priority for project works and Change Management decisions. Regular reviews will ensure the ongoing successful management of these risks across the division

Current Position

2. The IT Division Currently holds 2 risks on the Corporate Risk Register CR-16 and Cr-19.

The IT Division currently holds 14 risks, none of which are scored as Red.

All risks have owners, clear actions, with target dates to enable focussed management, tracking and regular and consistent reviews.

Current Status

3. This period the IT Risk Register has seen the following activity:

- 1 Additional risk added
- 3 Scoring changes
- 2 Risks Deactivated.

The remainder are static and continue to be monitored alongside the relevant on-going projects.

Additional Risk

4. CHB IT 022 Transformation – Benefits Realisation – CoL will not realise the benefits, including savings from contracts and storage and a more effective service to the business with a focus on service management.

Score Changes

5. Score Increases:

- CHB IT 006 – Service Operating Model (SOM) – This risk remains Amber. The score increased as the SOM is still being implemented with a completion date for all the required changes by end of May 18.
- CHB IT 007 – Target Operating Model (TOM) – This risk remains Amber. The score increased as the completion of the TOM changes is likely to be by early June 18.

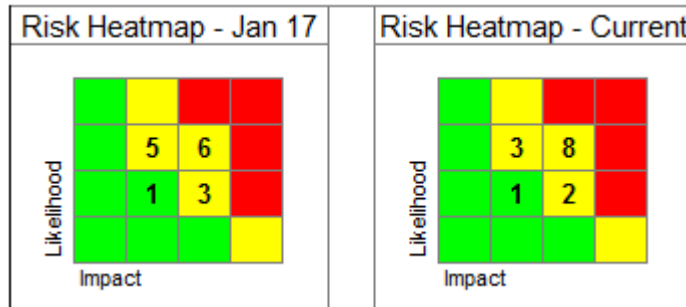
6. Score Decreases:

- CHB IT 001 – Resilience – Power and Infrastructure – This risk has reduced to Green. The score decreased from 12 to 4. Reduced to Green due to Transformation work that means the environment is now cloud based and is no longer reliant on local infrastructure thus minimising the requirements for UPSs. Although Green this risk will continue to be monitored.

Mitigated Risks

7. Two risks are now fully mitigated due to actions being completed thus reducing the impact and likelihood of the risk:
 - CHB IT 005 – IT Architecture – Reduced due to the production of an Architectural Reference Model and the Migration of services to the cloud
 - CHB IT 017 – Email Archiving and Enterprise Vault – Users have been migrated to an alternative system, Enterprise Vault will be switched off in due course.

The current headline figures for the identified risks in the Division are:



8. Further breakdown of current Division risks:

		Trend
Extreme Impact:		
Risks with "likely" likelihood and "extreme" impact:	0	↔
Risks with "unlikely" likelihood and "extreme" impact:	0	↔
Risks with "rare" likelihood and "extreme" impact:	0	↔
Major Impact:		
Risks with "likely" likelihood and "major" impact:	0	↔
Risks with "possible" likelihood and "major" impact:	8	↑
Risks with "Unlikely" likelihood and "major" impact:	2	↓
Serious Impact:		
Risks with "likely" likelihood and "serious" impact:	0	↔
Risks with "possible" likelihood and "serious" impact:	3	↓
Risks with "unlikely" likelihood and "serious" impact:	1	↔

9. Next steps

- Ensuring all actions are up to date and allocated to the correct responsible owners
- Ensuring all members of the IT division including suppliers are aware of how Risk is managed within the Corporation and have a mechanism to highlight areas of concern across the estate.

1. IT management processes, including Change Management, Problem Management, Continuous Improvement and Incident Management will all now reference or identify risk to ensure that Division risks are identified, updated and assessed on an ongoing basis, so the Risk register remains a live system, rather than a periodically updated record.

Samantha Kay

IT Business Manager

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Committee(s)	Dated:
Information Technology Sub-committee	22/03/2018
Subject: General Data Protection Regulation (GDPR) update report	Public
Report of: Michael Cogher, Comptroller & City Solicitor	For Information
Report author: Michael Cogher, Comptroller & City Solicitor,	

Summary

This report summarises the new requirements of the General Data Protection Regulation (GDPR) and progress of the GDPR project toward securing compliance with it by 25th May 2018. GDPR substantially updates data protection law, including changing conditions for processing, strengthening privacy and other rights and increasing penalties for breaches of the rules.

Recommendations

Members are asked to note the report.

Introduction

1. The current data protection regime is based on an EU Directive from 1995 and implemented in the UK by the Data Protection Act 1998. Since then there have obviously been significant advances in IT and fundamental changes to the ways in which organizations and individuals communicate and share information.
2. As a result the EU has introduced updated and harmonized data protection regulations known as the General Data Protection Regulation ("GDPR") which is due to come into force on 25 May 2018.
3. It will be implemented in the UK, notwithstanding Brexit, by legislation announced in the Queen's Speech.
4. This Report outlines the steps that the Corporation is taking to ensure that it is GDPR compliant.

Impact

5. The Information Commissioner's Office (ICO) which is responsible for guidance and enforcement of data protection has said:

"Many of the principles in the new legislation are much the same as those in the current Data Protection Act. If you are complying properly with the current law, then you have a strong starting point to build from. But there are some important new elements, and some things will need to be done differently".

6. GDPR introduces several new concepts and approaches. Equally many of the existing core concepts of personal data, data controllers and data processors are broadly similar. It remains founded on a principle based approach.
7. Whilst much detail and particularly the domestic legislation and ICO guidance is not yet available the Corporation needs to review its organisational and technical processes both corporately and departmentally.

GDPR Project Progress

8. Preparations for GDPR are well underway and in summary involve a review of the Corporation's information governance practices, policies and procedures; training and awareness raising; and ensuring the necessary technical IT and information security systems are GDPR compliant.

These tasks are the subject of a detailed project plan overseen by the Information Board and IS Steering Group and delivered by the GDPR Project Team and departmental Access to Information Network Representatives (AIN) and management teams.

9. The Comptroller & City Solicitor was formally appointed by committee as the Corporation's Data Protection Officer in November 2017.
10. The GDPR implementation project plan covering all tasks required to effectively prepare for GDPR compliance was created in September 2017 and audited by Mazars with a positive outcome and with no minor or major risks to project delivery identified.

11. Information governance

- GDPR Corporate Risk CR 25 was created and agreed by Audit & Risk Committee.
- GDPR compliance requirements and project plan reported to Policy & Resources, Establishment Committees and IT sub-committee.
- Project delivery is controlled by three weekly Project Team stage control meetings which monitor progress, capture GDPR issues and risks, assess required changes and associated corrective action and allocate work packages. The Project Team reports to the Information Board and IS Steering Group, additionally update reports and revised policies are reported to Policy & Resources and Establishment Committees and to IT sub-committee.
- Regular liaison with IT workstreams are taking place which are reported to the GDPR Project Team for action and to the Information Board.

12. Training and Communication

- Six half day training sessions to AIN representatives and key staff delivered by the Comptroller & City Solicitor and Senior Information Compliance Officer all AIN representatives have undertaken the initial training

- Two training sessions for Members have been delivered with two more planned
- GDPR detailed guidance notes issues to AIN representatives.
- Monthly 'drop in' training sessions scheduled until April 2018
- Further training sessions are planned on GDPR specifics such as privacy impact assessments, ROPA, fair processing notices, breach notifications etc
- Chief Officer updates are provided at COG, senior managers nominated as leads in each department, senior manager training sessions scheduled
- Mandatory e-learning course is in the final stages of development in liaison with HR
- GDPR corporate communications plan agreed with Communications Team with an initial roll out in March 2018 with a follow up in May 2018, will include
- A dedicated GDPR intranet page is in development to include guidance, news, policies, procedures, the relevant forms and FAQ's
- Detailed guidance tailored to departments has been delivered and will continue as department specific GDPR issues and risks arise
- Corporate GDPR communications plan agreed and scheduled with major awareness campaigns in April and May 2018
- Dedicated GDPR intranet page created with GDPR guidance, Q&A's, news and the project plan

13. Policies:

- GDPR related policies are currently being revised to incorporate GDPR requirements these are Employee Data Protection Policy, Data Protection Policy, Subject Access Rights Policy, Pupil and Parent Data Protection Policy, Data Breach Policy, Information Security Policy, Storage of Data Policy, Email use policy, System Vulnerability Policy, Encryption Policy, Security Patching Policy.

14. Procedures:

- GDPR requires a record of processing activities (ROPA), a proforma was issued to departmental AIN representatives, the returns are being analysed by the Information Compliance Team who will develop and maintain the central record which will include the reasons for collection and retention
- Subject Access Request procedures are currently being revised
- C&CS Contracts Team are liaising with contractors as data processors on GDPR requirements compliance
- Privacy Impact Assessment template is currently being tested on the CRM project
- Communicating Privacy Information requirements included in the ROPA returns from which the procedure will be developed
- Privacy Notices currently being drafted

- Data Breach procedures and template form drafted

15. Information Technology Systems:

- Audit of IT contracts to ensure new responsibilities is underway
- Two potential providers of a software solution to identify and resolve high risk to storage and processing of personal data and identify where a retention schedule is required are providing proof of concept
- Exchanging GDPR good practice with two local authorities
- IT systems capability to support Privacy Impact Assessments are being developed
- Information retention schedules and the right to be forgotten are being developed
- Applications Development and Support will start to test major applications that process personal data against the right to erasure
- On line internal Data Breach Notification form is being developed
- Drive rationalisation and security guidelines to be implemented

Validation of Approach & Implementation

16. Because of the risks presented by GDPR it has been agreed that a second review of the Corporation's approach and delivery of policies and procedures to meet the requirements will be undertaken by its internal auditors, Mazars, in mid-April 2018 and their findings reported to Summit and committees as appropriate.

Conclusion

17. GDPR places significant obligations on the Corporation in relation to the processing of personal data to protect the rights and freedoms of everyone.

The GDPR project has made significant progress, is anticipated that the Corporation will be generally compliant with GDPR requirements by May 25 2018.

Appendices

None

Michael Cogher

Comptroller & City Solicitor

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Committee(s)	Dated:
Audit and Risk Committee IT Sub Committee Establishment Committee Policy and Resources Committee	6 March 2018 26 March 2018 9 April 2018 12 April 2018
Subject: Data Protection Policy	Public
Report of: Michael Cogher, Comptroller and City Solicitor	For Decision
Report author: Michael Cogher, Comptroller and City Solicitor	

Summary

This report presents for consideration and adoption a revised Data Protection Policy for the Corporation (excluding the Police) in place of the current policy in preparation for the implementation of the General Data Protection Regulation on 25th May this year.

Recommendation

Members are asked to:

Approve and adopt the revised Data Protection Policy set out in Appendix 1 with effect from 25th May 2018.

Main Report

Background

1. The current data protection regime is based on an EU Directive from 1995 and implemented in the UK by the Data Protection Act 1998. Since then there have obviously been significant advances in IT and fundamental changes to the ways in which organizations and individuals communicate and share information.
2. As a result, the EU has introduced updated and harmonized data protection regulations known as the General Data Protection Regulation (“GDPR”) which is due to come into effect on 25 May 2018.
3. The Corporation is currently reviewing all its relevant policies and procedures to ensure it is compliant with the requirements of GDPR.

The Data Protection Policy

4. The proposed revised policy is set out in Appendix 1.
5. GDPR builds on and strengthens the current data protection requirements and introduces a number of new concepts.
6. The requirement to have a data protection policy arises from the current and strengthened requirements to ensure appropriate technical and organisational measures are in place to ensure the confidentiality, integrity and security of personal data and for greater transparency.
7. The revised Data Protection Policy is designed to be a short and concise overview of the Corporation's commitment to its obligations under GDPR with references to appropriate policies and procedures. It is self-explanatory and is intended to meet accepted good practice in terms of brevity and clarity.
8. It incorporates the revised data protection principles (six down from eight) and references to the expanded rights of data subjects, greater transparency requirements and privacy by design and default.
9. The obsolete current policy which dates from 2001 is set out in Appendix 2 by way of comparison.
10. Once in effect the Policy will be made available on the Website and supported by a brief guide detailing how it is different from the obsolete policy and the implications for users, as defined in the policy. It will be reviewed annually by the Data Protection Officer who will make appropriate recommendations for change (if any) to Committee.

Conclusion

11. The revised Policy is part of the Corporation's commitment to GDPR compliance and is recommended for adoption.

Appendices

Appendix 1 – Proposed Data Protection Policy
Appendix 2 – Current Data Protection Policy (2001)

Background Papers

None

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City of London Corporation (“the City of London”) Data Protection Policy

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1. Introduction

The City of London, PO Box 270, Guildhall, London EC2P 2EJ, is a Data Controller for the purposes of the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (“DPA 2018”). The Data Protection Officer at the City of London is the Comptroller and City Solicitor, Michael Cogher, and can be contacted at the same address or otherwise by email at michael.cogher@cityoflondon.gov.uk or information.officer@cityoflondon.gov.uk.

This policy outlines how the City of London will comply with its responsibilities under the GDPR and DPA 2018.

2. Statement

The City of London is committed to ensuring that it protects the rights and freedoms of all individuals with respect to the personal data it holds about them, whether in their personal or family life, or in a business or professional capacity.

3. Scope

This Policy applies to all users who handle information and personal data held by the City of London, including personal data of our service users, from children and young people, to vulnerable adults and the elderly as well as those who provide care for them.

This Policy applies to all employees, Members, contractors, third party employees, agency workers, temporary staff and any third party organisation who has legitimate agreed access to personal data held by City of London. (Please refer to the full Employee Data Protection Policy for full guidance for employees).

4. Definitions

Personal Data - data/information that relates to a living individual who can be identified from the data or from any other information that is in the possession of, or likely to come into the possession of the data controller. It includes any expression of opinion and any indication of the intentions of the data controller (or any other person) in respect of the individual.

Data Controller - the person or organisation who determines the purposes for which and the manner in which any personal data are, or are to be, processed. The City of London is the data controller in respect of all personal information that relates to City of London business. Elected Members are data controllers in their own right where they process personal data in their capacity as ward representatives.

Data Subject - is the identified or identifiable person to whom the personal data relates.

Processing - is defined very broadly and encompasses collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination,

restriction (that is, the marking of stored data with the aim of limiting its processing in the future, erasure and destruction. In effect, any activity involving personal data falls within the scope of the GDPR.

Data Processor - the person or organisation who processes personal data on behalf of a data controller.

5. Six Data Protection Principles

The City of London has an obligation to comply with the six Data Protection principles when processing personal data. These principles require that personal data:

1. Shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. Shall be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
3. Shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Shall be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that data which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Shall not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed. Personal data may be stored for longer periods provided it is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This is subject to the implementation of appropriate data security measures designed to safeguard the rights and freedoms of data subjects.
6. Shall be processed in a manner that ensures its appropriate security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The City of London will ensure that it is able to demonstrate compliance with all of the above six principles by:

- Following best practice in all personal data processing;
- adhering to the relevant processing conditions for the fair and lawful processing of personal data and special categories of personal data (set out on page 4);
- telling people why we are processing their personal data and who we will share their personal data with, through our clear and effective privacy notices;
- ensuring that if relying on consent from the data subject, it is freely given, specific, informed and unambiguous;
- implementing "privacy by default" measures to ensure that, by default, we only process the personal data necessary for each specific business purpose;

- ensuring all staff and people working for the City of London complete the mandatory Data Protection e-learning course as part of their induction and any subsequent refresher training;
- ensuring the Records of Processing Activities (“ROPA”) is reviewed annually and kept up to date;
- ensuring a robust personal data breach detection, investigation and internal reporting procedure is in place;
- ensuring transfer of personal data outside of the EEA is only carried out with a valid adequacy mechanism legitimising such a transfer;
- ensuring personal data is only kept for as long as necessary in accordance with the retention schedules.

6. Data Processing Conditions

The City of London will ensure that it processes personal data lawfully. Processing is lawful under Article 6 of the GDPR if one of the following applies:

- a) The data subject consents to the processing;
- b) the processing is necessary for performing a contract with the data subject;
- c) the processing is necessary for complying with a legal obligation;
- d) the processing is necessary for protecting the vital interests of the data subject;
- e) the processing is necessary for performing a task carried out in the public interest; or
- f) the processing is necessary for pursuing the legitimate interests of the data controller or a third party, except where the data subject's interests or fundamental rights and freedoms override the data controller's interests.

7. Data Subject Rights

The GDPR provides data subjects with several rights, including, but not limited to the right to:

- Be provided with a privacy notice containing certain information about the processing activities;
- Confirm whether the data controller processes personal data about the data subject and the right to access the personal data processed and obtain certain information about the processing activities (**Subject Access**);
- Correct inaccurate personal data (**Rectification**);
- Have personal data erased under certain circumstances (**Erasure**);
- Restrict the processing of personal data under certain circumstances (**Restriction**);
- Receive a copy of the personal data the data controller holds under certain circumstances and transfer the personal data to another data controller (**Data Portability**);
- Object to processing of personal data (**Right to Object**);

- Not be subject to a decision based solely on automated processing, including profiling (**Automated Decisions**).

Data subjects can exercise these rights by contacting the Information Compliance Team at information.officer@cityoflondon.gov.uk or the Data Protection Officer. Please refer to the full Data Subject Rights' Policy for further details.

8. Related Policies / Other Resources

- [Employee Data Protection Policy](#)
- [Data Subject Rights](#)
- [Retention Policy/Schedules](#)
- [Employee Code of Conduct](#)
- [Communications and Information Systems Use Policy](#)
- [Pupil and Parent Data Protection Policy](#)
- [Information Commissioner's Office](#)
- [General Data Protection Regulation](#)
- [Data Protection Act 2018](#)

9. Review

This policy will be reviewed at least annually or whenever legal or statutory changes demand, by the City of London's Data Protection Officer.

Draft: 1 February 2018

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Corporation of London Data Protection Policy

This is a statement of the Data Protection policy adopted by Corporation of London to cover its obligations under the 1998 Data Protection Act.

The Corporation of London needs to collect and use certain types of information about people with whom it deals with in order to operate. These include current, past and prospective employees, suppliers, clients/customers, residents, tenants and others with whom it communicates. In addition, it may occasionally be required by law to collect and use certain types of information of this kind to comply with the requirements of government departments for business data, for example. This personal information must be dealt with properly however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the Data Protection Act 1998.

We regard the lawful and correct treatment of personal information by Corporation of London as very important to successful operations, and to maintain confidence between those with whom we deal and ourselves. We ensure that our organisation treats personal information lawfully and correctly.

To this end we fully endorse and adhere to the Principles of Data Protection, as enumerated in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- Shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- Shall be accurate and, where necessary, kept up to date;
- Shall not be kept for longer than is necessary for that purpose or purposes;
- Shall be processed in accordance with the rights of data subjects under the Act;
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.

Therefore, Corporation of London will, through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information;

- Meet its legal obligations to specify the purposes for which information is used;
- Collect and processes appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- Ensure the quality of information used;
- Apply strict checks to determine the length of time information is held;
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. (These include: the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct rectify, block or erase information which is regarded as wrong information);
- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards.

In addition, the Corporation of London will endeavour to ensure that:

- There is someone with specific responsibility for Data Protection in the organisation. (Currently, the Nominated Person is the IS Division Security Officer);
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
- Everyone managing and handling personal information is appropriately trained to do so;
- Everyone managing and handling personal information is appropriately supervised;
- Anybody wanting to make enquires about handling personal information knows what to do;
- Queries about handling personal information are promptly and courteously dealt with;
- Methods of handling personal information are clearly described;
- A regular review and audit is made of the way personal information is managed;
- Methods of handling personal information are regularly assessed and evaluated.
- Performance with handling personal information is regularly assessed and evaluated.

Committee(s)	Dated:
IT Sub Committee	26/03/2018
Subject: Design, build, support and hosting for new website	Public
Report of: Town Clerk (Director of Communications)	For Information
Report author: Melissa Richardson, Communications, Town Clerks	

Summary

The purpose of this report is to keep Members updated on the progress of the website project.

On 20 February an Options paper for procurement was taken to the IT category board and approved.

The Gateway 3/4 paper is going to Projects Sub on 14 March and Policy & Resources on 12 April.

This paper outlines the options and explains the costing requests.

- Options overview:
 - 1. New website hosted in the cloud, plus support and maintenance
 - 2. Do nothing. No website as will be taken down as a security risk
 - 3. Retain an internally hosted website which would be reliant on the robustness of our servers and the need to buy in skills to build and subsequently support it. [This option is susceptible to single point of failure in terms of in-house skills and is unlikely to be cost effective.]

Option 1 is the proposed way forward. With agreement we would go out to tender this summer and have suppliers in place by the end of this year.

Main Report

Background

The current website was launched in 2012 and, inevitably, is showing its age. The prime reason for starting this project is that all support for SharePoint 2010 [current website platform] will cease in October 2020 (regular support stopped in 2015). SharePoint will not be providing a platform for external sites in future, so it cannot simply be updated and leaving it on the unsupported platform, whilst potentially possible, is clearly a risk.

Additionally, it does not display well on mobile devices, is not task structured (ie lacking user focus) and the out of the box search engine cannot provide the results from across the full range of corporate information (ie Member, Jobs and Media sites are separate) that users would expect.

Current Position

In July 2017 the project started with the weekly IT project review to agree soft market testing which would inform the specification.

[A supplier open day was held to test the market and gain feedback on likely costs and timescales for the project. This has provided an estimated capital figure of £360,000 and ongoing revenue costs for support, hosting and capital cost and a licence for a better search engine (£313,000). There are plans for a contribution from IT towards revenue costs (representing their previous internal investment), but this will not be sufficient to cover our ambitions to provide a world-class search engine or to fully support cloud hosting.]

Subsequently, the IT Category Board agreed the Procurement and the project was agreed at Gateway 1/2 by Projects Sub Committee. A digital consultant was employed to gather the business requirements and to draft the invitation to tender.

On 20 February an Options paper was taken to the IT category board and approved.

The Gateway 3/4 paper is going to Projects Sub on 14 March and Policy & Resources on 12 April.

Options

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>
Brief description	New website hosted in the cloud, plus support and maintenance	Do nothing. No website as will be taken down as a security risk	Retain an internally hosted website which would be reliant on the robustness of our servers and the need to buy in skills to build and subsequently support it.
Total Estimated cost	Capital Costs - £375,000 (including proposed £15,000 capital for federated search), Revenue Costs - ongoing revenue costs for support and hosting (£80k),	N/A	Either look to existing Agilisys Team to nominate replacement CMS or bring new team in-house. Support for the Corporation Website is just one of the

	<p>plus cost and licence for a better search engine (£40k), project manager costs (£130k), pre-launch assessment (£8k) and ongoing user testing (£40k), spend to date (£7,286); total revenue= £305,286</p> <p>Estimated Total - £680,286</p>		<p>functions provided by the Agilisys SharePoint Team, therefore it is not envisaged that there would be any savings in this area from moving to an external support model.</p>
Benefits	<p>More flexible and resilient as a platform, i.e. cloud hosted.</p> <p>Appropriate expertise available and broader experience</p> <p>Able to access knowledge/expertise (agile supply) when required through support options.</p> <p>Meets IT Strategy to use SaaS solutions, where possible.</p>	<p>No demands on finances or resources</p>	<p>Able to design and build at City's pace.</p>
Risk implications	<p>Reliance on third party may introduce risk of non-performance.</p>	<p>Site becomes a security risk and has to be taken down leaving us with no web presence</p>	<ul style="list-style-type: none"> • Unable to find necessary skillset at an affordable price • Not part of IT strategy. <p>No funding agreed for hiring permanent staff.</p>

Proposals

Option 1 is the proposed way forward. With agreement we would go out to tender this summer and have suppliers in place by the end of this year.

The project officer has liaised with City procurement and PT 3 (options) has been agreed. Procurement have recommended option 1, with the proposed route to market of competitive tender via the digital marketplace (G Cloud)

Conclusion

Pending approvals at Projects Sub and Policy & Resources committees, this will go out to tender in the Summer with Gateway 5 and IT Category Boards to follow in the Autumn. This will allow an early discovery phase (suppliers liaising in order to make informed recommendations about how to meet required outcomes), enabling work to start properly in early 2019. Based on previous experience, this will allow a realistic amount of time for building and testing to ensure the new site is ready before October 2020.

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