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CITY OF LONDON

# Digital Services Sub (Finance) Committee INFORMAL MEETING

**Date:** **FRIDAY, 3 SEPTEMBER 2021**

**Time:** 11.00 am

**Venue:** **MICROSOFT TEAMS**

**Members:**
Randall Anderson (Chairman)
Alderman Sir Peter Estlin (Deputy Chairman)
Rehana Ameer
Deputy Roger Chadwick
John Chapman
Alderman Prem Goyal
Deputy Jamie Ingham Clark
Andrew Mayer
Jeremy Mayhew
James Tumbridge
Dawn Wright

**Enquiries:** **Antoinette Duhaney**
**antoinette.duhaney@cityoflondon.gov.uk**

**Accessing the virtual public meeting**

Members of the public can observe this virtual public meeting at the below link:

https://youtu.be/HBUW_GM48XM

This meeting will be a virtual meeting and therefore will not take place in a physical location. Any views reached by the Committee today will have to be considered by the Assistant Town Clerk after the meeting in accordance with the Court of Common Council's Covid Approval Procedure who will make a formal decision having considered all relevant matters. This process reflects the current position in respect of the holding of formal Local Authority meetings and the Court of Common Council's decision of 15th April 2021 to continue with virtual meetings and take formal decisions through a delegation to the Assistant Town Clerk and other officers nominated by him after the informal meeting has taken place and the will of the Committee is known in open session. Details of all decisions taken under the Covid Approval Procedure will be available online via the City Corporation's webpages.

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**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**

   To agree the public minutes and non-public summary of the meeting held on 23 July 2021.

   **For Decision**
   (Pages 5 - 10)

4. **OUTSTANDING ACTIONS**

   Joint report of the Town Clerk and the Chief Operating Officer.

   **For Information**
   (Pages 11 - 12)

5. **FORWARD PLAN - SEPTEMBER 2021**

   Joint report of the Town Clerk and the Chief Operating Officer.

   **For Information**
   (Pages 13 - 14)

6. **WEB SITE REVIEW AND DEEP DIVE (ORAL UPDATE)**

   The Director of Communications to be heard.

   **For Information**

7. **DATA PROTECTION - 2020 ANNUAL REPORT**

   Report of the Comptroller & City Solicitor.

   **For Information**
   (Pages 15 - 30)

8. **FREEDOM OF INFORMATION ACT/ENVIRONMENTAL INFORMATION REGULATIONS - 2020 ANNUAL REPORT**

Report of the Comptroller & City Solicitor.

**For Information**
(Pages 31 - 46)

9. **SOCIAL VALUE UPDATE**

Report of the Chief Operating Officer.

**For Information**
(Pages 47 - 50)

10. **MODERN.GOV APP PILOT EVALUATION**

Report of the Chief Operating Officer.

**For Information**
(Pages 51 - 54)

11. **IT CORPORATE RISKS AND RISK APPETITE DEEP DIVE**

Report of the Chief Operating Officer.

**For Decision**
(Pages 55 - 64)

12. **IT DIVISION RISK UPDATE**

Report of the Chief Operating Officer.

**For Information**
(Pages 65 - 74)

13. **IT DIVISION - IT SERVICE DELIVERY SUMMARY**

Report of the Chief Operating Officer.

**For Information**
(Pages 75 - 84)

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**

To agree the non-public minutes of the meeting held on 23 July 2021.

**For Decision**
(Pages 85 - 88)

18. **CYBER SECURITY**

Report of the Chief Information Security Officer.

**For Information**
(Pages 89 - 110)

19. **GATEWAY REPORTS**

a) In-Vehicle Audio/Video System (Pages 111 - 126)

Report of the Commissioner of the City of London Police.

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

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

## DIGITAL SERVICES SUB (FINANCE) COMMITTEE

**Friday, 23 July 2021**

Minutes of the meeting of the Digital Services Sub (Finance) Committee held at Guildhall, EC2 on Friday, 23 July 2021 at 11.00 am

**Present**

**Members:**
Randall Anderson (Chairman)
Alderman Sir Peter Estlin (Deputy Chairman)
Rehana Ameer
Deputy Roger Chadwick
John Chapman
Alderman Prem Goyal
Deputy Jamie Ingham Clark
Andrew Mayer
Jeremy Mayhew
James Tumbridge
Dawn Wright

**Officers:**

| | | |
|---|---|---|
| Emma Moore | - | Chief Operating Officer |
| Sean Green | - | Chamberlain's Department |
| Gary Brailsford-Hart | - | City of London Police |
| Kevin Mulcahy | - | Chamberlain's Department |
| Melissa Richardson | - | Chamberlain's Department |
| Lorraine Brook | - | Town Clerk's Department |
| Graeme Quarrington-Page | - | Chamberlain's Department |
| Jonathan Chapman | - | Chamberlain's Department |
| Tony Macklin | - | Markets and Consumer Protection Department |
| Matt Gosden | - | Chamberlain's Department |
| Jaime Rose | - | Town Clerk's Department |
| Robert Williams | - | City of London Police |
| Jonathan Chapman | - | City of London Police |
| James McDonald | - | City of London Police |
| Simone Edwards | - | City of London Police |
| Eugene O'Driscoll | - | Agilisys, Chamberlain's Department |
| Richard Waight | - | City of London Police |
| Antoinette Duhaney | - | Town Clerk's Department |

1. **APOLOGIES**
None.

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 and non-public summary of the meeting held on 28th May 2021 be approved as an accurate record.

4. **OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS**

The Sub-Committee considered a joint report of the Town Clerk and the Chamberlain providing updates on outstanding actions from previous meetings.

*Mod.gov pilot*

Officers reported that most Sub Committee Members were now using the Mod.gov App and The Chairman suggested that Policy and Resources Committee be requested to provide clarity on the direction of travel and future aspirations for technology solutions. Members also discussed the merits of providing paper agenda packs going forward and whilst there was support for digital papers as the default, there were strong arguments for retaining paper packs in some circumstances.

Members supported a formal funded IT lead project with input from the Town Clerk's Department to drive the Digital Agenda and it was suggested that the Sub Committee's views be conveyed to the Policy and Resources Committee Chair.

In response to questions and observations from Members, Officers advised that an end date should be agreed so that the pilot could be evaluated prior to any decisions on next steps.

*Meeting recording and streaming costs*

Members requested details on costs for recording and streaming meetings and suggested that Officers explore options for the Town Clerk's Department to manage the process for streaming and recording of meetings.

In response to questions and comments from Members, Officers stated that At the start of the COVID-19 Pandemic, off the shelf solutions had been used to stream/record meetings. However now was a good time to review technology solutions to see which were most suitable for CoL needs and also discuss which Department is best placed to manage streaming and recording of meetings going forward.

**RESOLVED** –

1. That the Sub Committee notes the report.

2. That Officers revisit technology solutions and consider which Department is best placed to manage streaming and recording of meetings going forward.

3. That the Sub Committee's views be conveyed to the Policy and Resources Committee Chair and that the Policy and Resources Committee be requested to provide clarity on the direction of travel and future aspirations for technology solutions.

5. **FORWARD PLAN - JULY 2021**
The Sub-Committee considered a report of the Chamberlain setting out the Sub-Committee's proposed work plan for forthcoming meetings.

**RESOLVED** – That the Sub Committee notes the report.

6. **MEMBER GOVERNANCE OF THE ENTERPRISE RESOURCE PLANNING (ERP) PROJECT DELIVERY**
The Sub-Committee considered a report of the Chamberlain concerning Member Governance of the Enterprise Resource Planning (ERP) Solution Project Delivery.

**RESOLVED** – That the Sub Committee notes the report.

7. **IT DIVISION - IT SERVICE DELIVERY SUMMARY**
The Sub-Committee considered a report of the Chief Operating Officer in relation to the IT Division – IT Service Delivery Summary.

**RESOLVED** – That the Sub Committee notes the report.

8. **IT DIVISION RISK UPDATE**
The Sub-Committee considered a report of the Chief Operating Officer in relation to risk and risk mitigation.

**RESOLVED** – That the Sub Committee notes the report.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
None.

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
See item 10a below.

10.1 **Digital Services Strategic Roadmap for the City of London Police**

The Sub Committee considered a report of the Chief Operating Officer regarding the Digital Services Strategic Roadmap for the City of London Police.

Members suggested a move towards shared services to achieve efficiencies/value for money and it was reported that the new Commissioner of the CoLP was committed to shared services.

**RESOLVED** – That the Sub Committee:

1. Approve the City of London Police's Digital Services Strategic Roadmap accompanying this report as the basis in principle for the digital transformation of the CoLC's services

2. Support the IT Director and Chief Operating Officer in setting the clear expectation amongst CoLP stakeholders that this roadmap shall be used as a guide for any local digital transformation initiatives within their own services; and that the CoLC IT team shall be notified of such initiatives so that they can be fully supported in a collaborative way, seeking to leverage value across the CoLC family.

11. **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.

| **Item No.** | **Paragraph(s) in Schedule 12A** |
|---|---|
| 12 - 17 | 3 |

12. **NON-PUBLIC MINUTES OF THE PREVIOUS MEETING**
The Sub Committee approved the non-public minutes of the meeting held on 28th May 2021 as an accurate record.

13. **CYBER SECURITY**
The Sub Committee received a report of the Chief Operating Officer regarding Cyber Security.

14. **GATEWAY REPORTS**

14.1 **Barbican Airwave Coverage**

The Sub Committee received a report of the Chamberlain in relation to the Barbican Airwave Coverage.

14.2 **Azure Point-to-site Virtual Private Network (VPN)**

The Sub Committee received a report of the Chamberlain in relation to the Azure Point-to-site Virtual Private Network (VPN).

### 14.3 Digital Asset Management System Project (City of London Police)

The Sub Committee considered a report of the Commissioner of the City of London Police concerning the Digital Asset Management System Project (City of London Police).

### 14.4 Digital Social Media Project (City of London Police)

The Sub Committee received a report of the Commissioner of the City of London Police regarding the Digital Social Media Project (City of London Police).

### 14.5 Software Defined Wide Area Network (WAN) Upgrade

The Sub Committee considered a report of the Chamberlain in relation to the Software Defined Wide Area Network (WAN) Upgrade.

## 15. INFORMATION MANAGEMENT STRATEGY IMPLEMENTATION WORKSHOP

The Sub Committee received a presentation regarding implementation of an Information Management Strategy.

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

There were no non-public questions.

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

There was one item of non-public business.

### 17.1 Cloud Service Provider (CSP) Award

The Chairman drew the Sub Committee’s attention to the above report which was approved by the Sub Committee under urgency procedures.

**The meeting ended at 12.59 pm**

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Chairman

**Contact Officer: Antoinette Duhaney**
**antoinette.duhaney@cityoflondon.gov.uk**

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## Digital Services Sub (Finance) Committee – Outstanding Actions (Public)

| Item | Meeting Date | Action and target for completion | Officer responsible | To be completed/ Next stage | Progress update |
|---|---|---|---|---|---|
| 3 | 26 March 2021 | That Officers circulate the legal opinion in respect of GDPR concerns in respect of the use of Mailchimp and Survey Monkey to Members. | Sam Collins | 28 May 2021 | Document was circulated - Closed |
| 6 | 26 March 2021 | That a status update on the Mod.gov App pilot be presented to the next Digital Services Sub Committee on 28 May 2021 | Lorraine Brook | 28 May 2021 | Verbal update was provided at the Sub Committee's meeting on 28 of May 2021. - Closed |
| 14 | 28 May 2021 | The Chamberlain to pursue with the Town Clerk's Department in order to ensure that resource for live streaming of meetings was allocated to the appropriate Department so that the true costs associated with supporting virtual meetings were known. | Sam Collins | 28 May 2021 | COVID Funds provided to cover the costs of the resources in IT until the end of March 2022 have been approved. - Closed |

## Digital Services Sub (Finance) Committee – Outstanding Actions (Public)

| | | | | | |
|---|---|---|---|---|---|
| 4 | 23 July 2021 | 2. That Officers revisit technology solutions and consider which Department is best placed to manage streaming and recording of meetings going forward.<br>3. That the Sub Committee's views be conveyed to the Policy and Resources Committee Chair and that the Policy and Resources Committee be requested to provide clarity on the direction of travel and future aspirations for technology solutions | | | Meeting in September with Assistant Town Clerk/Head of Committee Services booked<br>Committee Clerk emailed with the question for the Committee Chair |

## Forward Plan – September 2021

| Report Title | Report Month | Category |
|---|---|---|
| CoLP IT Shared Services Review – what do they need that should not be provided to IT Shared Services and Why?  efficiencies and benefits – common platforms and options | November 2021 | Strategic |
| IT Priorities Plan 21/22 | November 2021 | Strategic |
| IT Security/Cyber-attack mitigations - Deep Dive | November 2021 | Strategic |
| IT Savings Plan and Impacts Update | November 2021 | Strategic |
| 2022 IT Roadmap Review and Capital Bids | November 2021 | Strategic |
| Compute and Storage review – Secure City and other needs | November 2021 | |
| IT Target Operating Model Review | November 2021 | Strategic |
| Deep Dive IT User Experience (Different Stakeholders) | January 2022 | Strategic |
| Service Management Automation and Roadmap – part of roadmap discussion | January 2022 | Strategic |
| Smart City Support from IT | January 2022 | Strategic |
| Police Accommodation Technology Review – check when budget is being set and the technology scope agreed | March 2022 | Strategic |
| IT Digital Services Strategic Roadmap Deep Dive | March 2022 | Strategic |
| IT Business Plan and Balanced Scorecard | March 2022 | Strategic |
| ERP Programme Deep Dive | March 2022 | Strategic |
| IT Service Model 2023 Review | March 2022 | Strategic |
| Digital and Smart City Deep Dive | May 2022 | Strategic |

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|---|---|
| **Committee:**<br>Digital Services Sub (Finance) Committee | **Dated:**<br>03.09.2021 |
| **Subject:**<br>Data Protection - 2020 Annual Report | **Public** |
| **Report of:**<br>Michael Cogher<br>Comptroller & City Solicitor | **For Information** |
| **Report author:**<br>Sophie Jordan<br>Compliance Manager – DP & FOI | |

## Summary

A high standard of compliance with the legislation was maintained in 2020 at a corporate and departmental level, in the context of challenges presented by the Covid-19 pandemic, and the subsequent changes to existing Data Protection legislation as a result of wider Brexit implications.

## Recommendation(s)

Members are requested to note the report.

## Main Report

### Background

1. This is the eighth annual report in respect of corporate and departmental compliance with the Data Protection Act 2018.

2. The Data Protection Act 2018 (DPA 2018) governs everything the City of London (CoL) does with personal information (which is any information relating to an identifiable, living person), from collection/creation to destruction, in any medium. It applies to the whole of the CoL. However, the following are data controllers in their own right: City of London Police; Sir John Cass's Foundation Primary School; Museum of London; Members as to their Ward work; and the Electoral Registration Officer.

3. In addition to the DPA 2018, the CoL also processes personal data in accordance with the European Union General Data Protection Regulation (EU GDPR), as established on the 25 May 2018. It is noted that following Brexit agreements, there will be a new version of the GDPR implemented, known as the United Kingdom General Data Protection Regulation (UK GDPR), which will also apply to the personal data processed by the CoL.

4. The risk of Data Protection breaches, given that the CoL routinely processes personal information, is overseen as part of Corporate Risk 16, Information Governance, and Corporate Risk 25, GDPR Project.

5. Co-ordination of the DP compliance work is undertaken by the Compliance Team who are based, in the Comptroller & City Solicitor's Department,

6. The Comptroller & City Solicitor, to whom the Compliance Team reports in respect of data protection matters, is the CoL's designated Data Protection Officer (DPO). A designation is required under Article 37 of the EU and UK GDPR.

7. Each department has a responsibility for the personal information it holds and a shared responsibility for compliance with the DP requirements. To assist with departmental responsibility and corporate coordination, the Information Officer (as was) established, in 2003, an Access to Information Network (AIN), with one or more representatives in every Department. The duties of an AIN were formalised in a memo in 2003[1] and consist, in summary of assisting in ensuring all aspects of compliance within their areas with the FOI, EIR, Data Protection Act 2018 (DPA) and Re-use of Public Sector information (RePSI) legislations.

## Breaches or Potential Breaches

8. The Information Commissioner can fine data controllers up to £17million for breaches of the DPA 2018, and/or impose enforcement action such as an Enforcement Notice (to not comply with which would be a criminal offence), or an Undertaking, which is a more informal approach but still potentially onerous. To date it is noted that the CoL has never received any fines or other enforcement action.

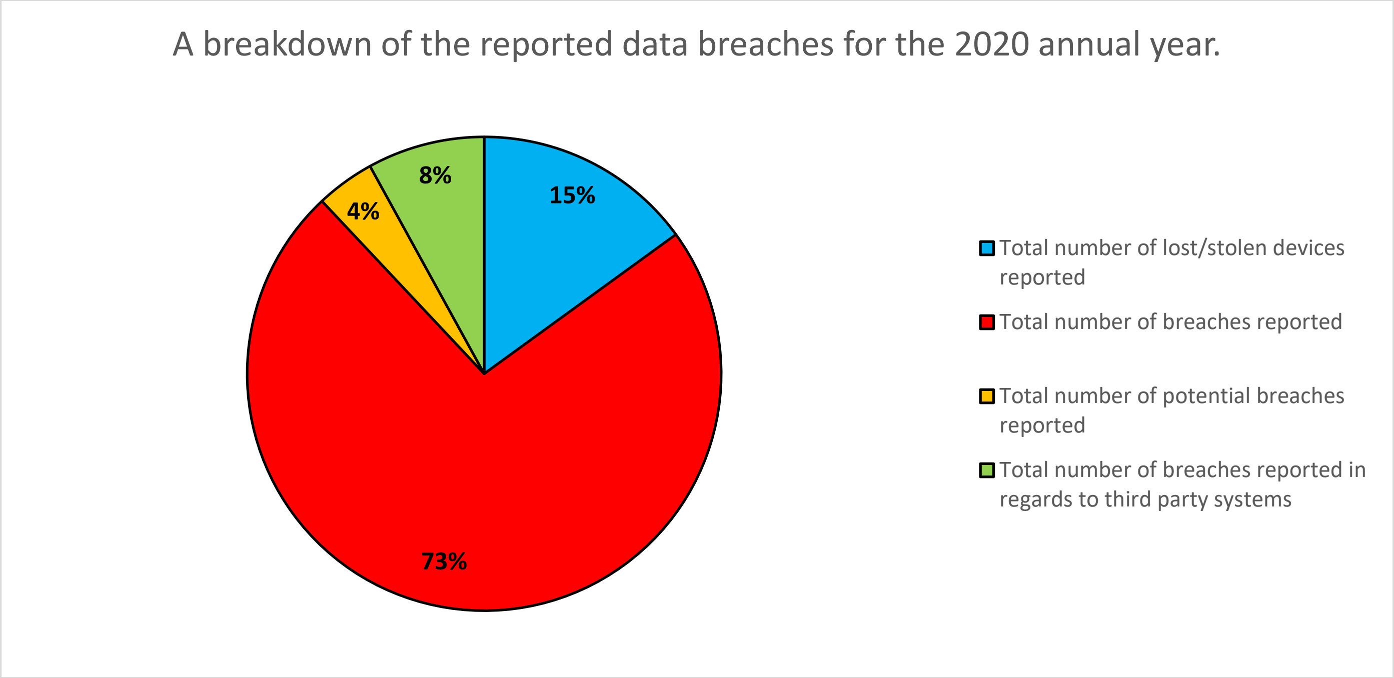
9. All breaches, or potential breaches[2], of the DPA 2018 are required to be reported to the Compliance Team and the relevant departmental AIN Representative, as soon as known, and subsequently to the DPO and members if the breach is deemed to present a high level of risk. To ensure we meet legal requirements as to any required reporting by the DPO to the regulator (the Information Commissioner), all breaches should be reported to the Compliance Team and AIN Representative within 72 hours of the staff member becoming aware of the incident, irrespective of the level of risk. To assist this process there is a DP Breach Notification Form held on the CoL's Intranet, and available on request from the Compliance Team.

10. The Compliance Team assists the Department in managing the breach or potential breach. This may include assisting with formal apologies, contacting unintended recipients of information, reinforcing training requirements, and ensuring that staff understand the procedures to be followed to prevent a recurrence. Should a breach be considered as presenting a significant level of risk then an investigation report is produced for the Data Protection Officer.

11. In the 2020 annual year there were 100 reported breaches. Of these,15 were in regard to devices that were reported as lost/stolen, but all devices had been encrypted and disabled, or otherwise protected and so no breach or potential breach was raised. Nevertheless, as in previous years, they are included in the total annual figure (please see paragraph 17 for annual totals). Of the remainder, 73 breaches and 4 potential breaches and 8 breaches that were the fault of a third-party provider were recorded under the DPA 2018.

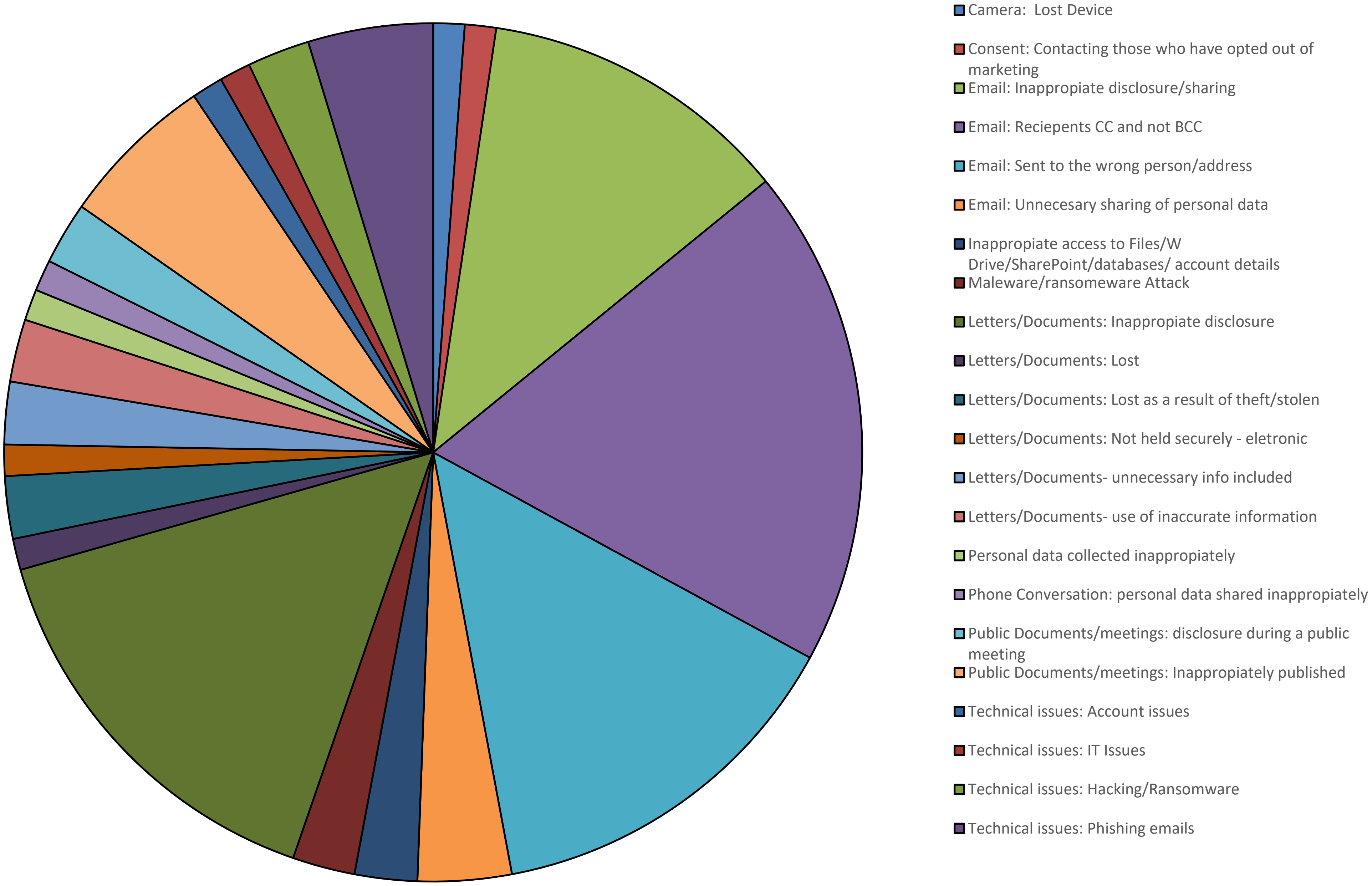
[1] Memo for AIN role 2003

[2] 'Potential breaches' are where breaches are not proven even though the circumstances may suggest that a breach has occurred.



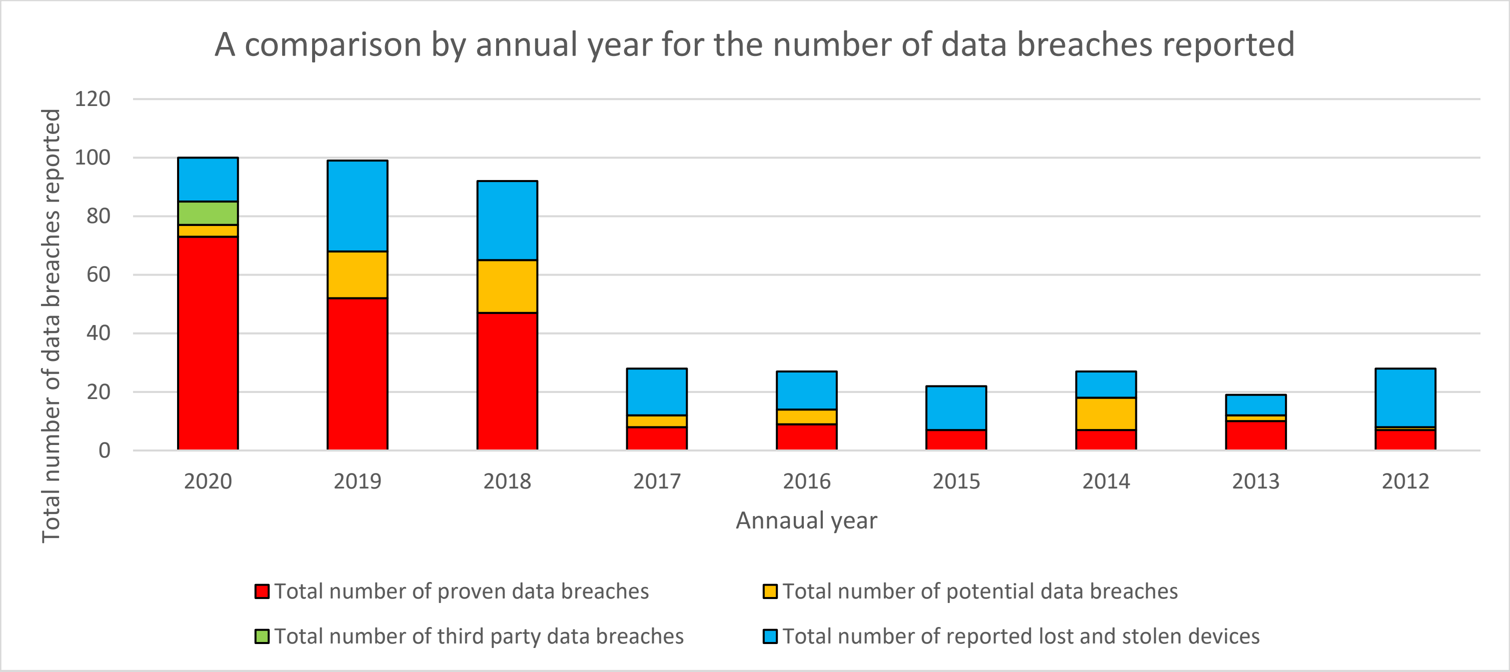
12. During the 2020 annual year there were 85 instances of either a data breach, potential data breach or a data breach relating to a third party reported. Please see the following pie chart for a breakdown of causes for these breaches.

## A breakdown of the reported causes for data breaches reported in 2020



13. Of the 85 breaches reported, 73 were found to be proven breaches. Of the 73 proven breaches only 1 was considered to demonstrate a high level of risk, thereby meeting the criteria necessary for reporting the incident to Information Commissioner Office. It is noted that in this case the Commissioner did not issue enforcement action.

14. Figures for breaches reported to the Compliance Team are as follows, please see **appendix one** for a further breakdown:



*Please note that prior to 2020, third party data breaches were included in the totals reported for proven data breaches.

15. The increase in reported breaches in 2020 is considered an outcome of greatly increased vigilance by departments in the context of the much stricter requirements of the DPA 2018, including reporting requirements, coupled with greater staff awareness of DP issues as a result of both internal communications, campaigns and external media reporting. It is also evident that while the numbers have increased, the severity of the cases has not.

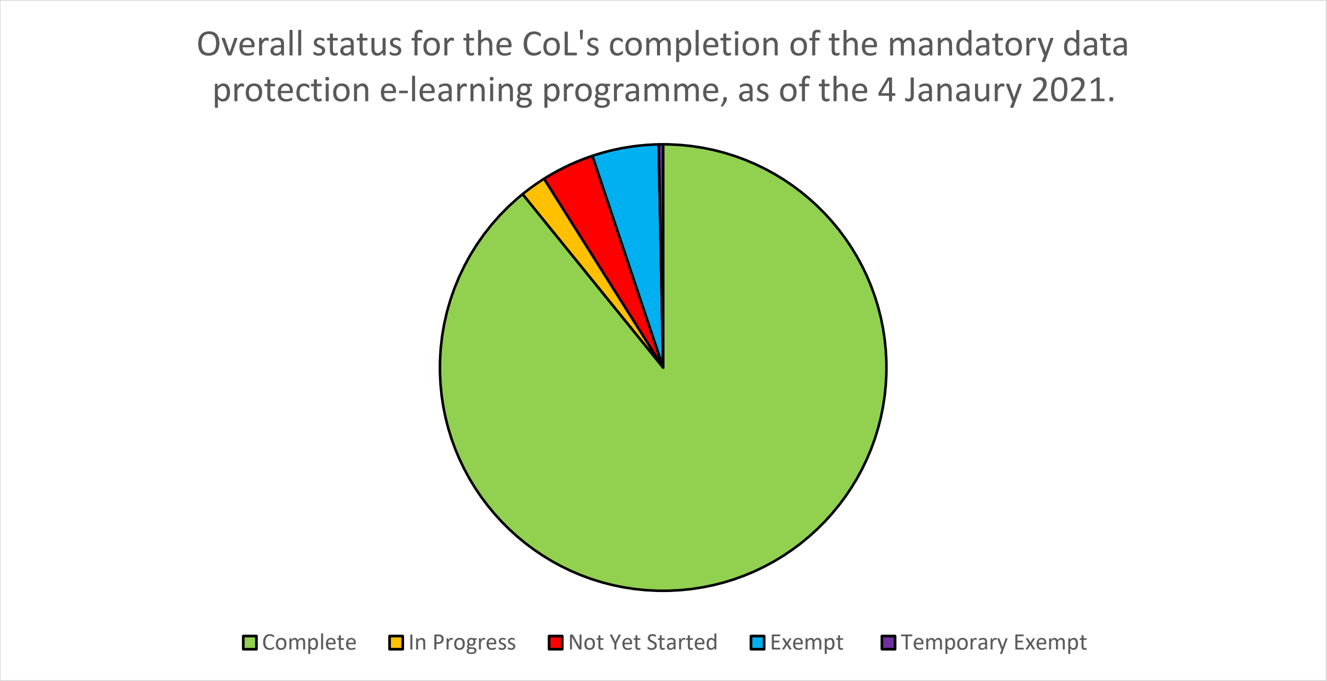
### DP Guidance

16. The Compliance Team routinely provides departments, on request, with DP guidance on specific issues. In addition, there has been since 2004 considerable DP guidance for staff on the Access to Information Intranet pages, provided by the Compliance Team and is in the process of being updated, as required, in line with the new legislation. In addition, a Microsoft Teams site has also been established in order to provide quick guidance to AIN reps.

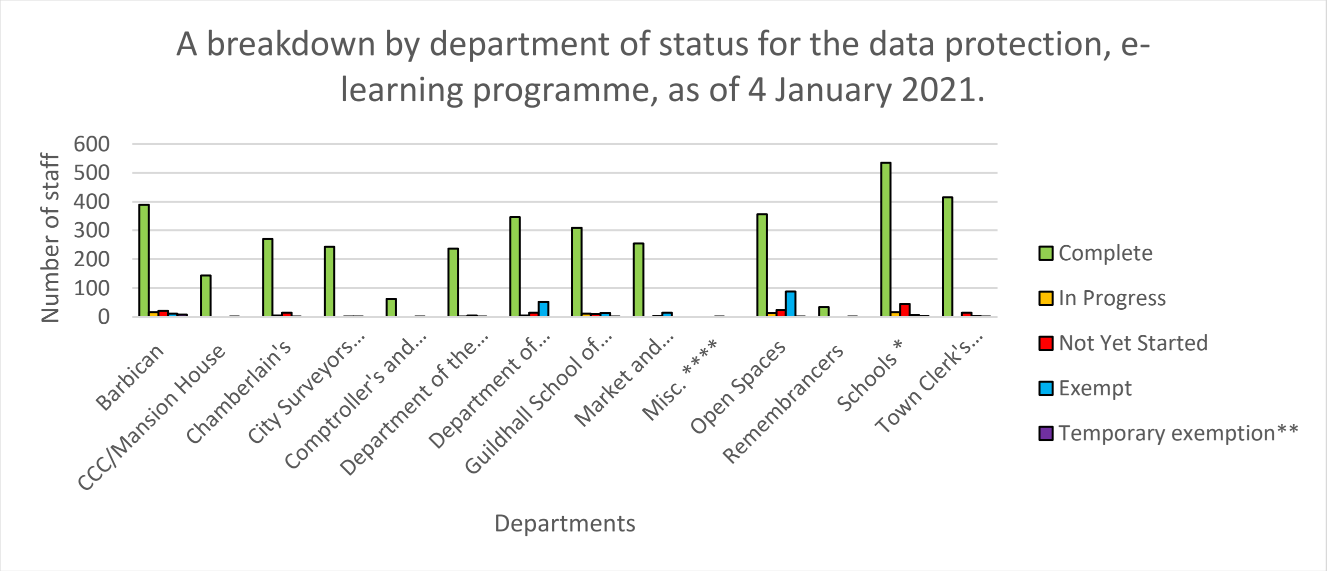
### DP Training

17. There has been a high uptake of the new e-learning mandatory data protection package. At the end of the 2020 annual year the overall figure for the City of London

was that 94.30% of staff had completed training (this figure includes a small percentage that were made exempt or temporally exempt).



The Compliance team continues to review and monitor the uptake of the data protection training and provides reports to Chief Officers on an annual basis. A breakdown by of completion status by department is provided below, with further information provided in **appendix 2.**



### DP Auditing

18. The annual CoL DP audit did not take place in 2020 due to the impact of Covid-19 on working practices. The annual DP audit requires a review of physical working environments and therefore has been put on hold until the majority of staff are able to return to the office environment.

19. An external audit undertaken by Mazars in July 2019 with regards to the implementation of GDPR, which found that the CoL had achieved moderate assurance with the GDPR (having an adequate control framework in place but weaknesses…

which may put some system objectives at risk) and that the CoL was in the progress of becoming fully compliant. Internal Audit undertook a further review of the key areas highlighted by the Mazars report.

- Continued monitoring of the mandatory Data Protection training.
- A review of the corporate ‘W’ drive.
- A review of the retention policies
- The re-introduction of the annual DP audit.

20. Following the further review by internal audit, it was found that the following areas highlighted by Mazars were no longer valid:

- Continued monitoring of the mandatory Data Protection training.
- The re-introduction of the annual DP audit.

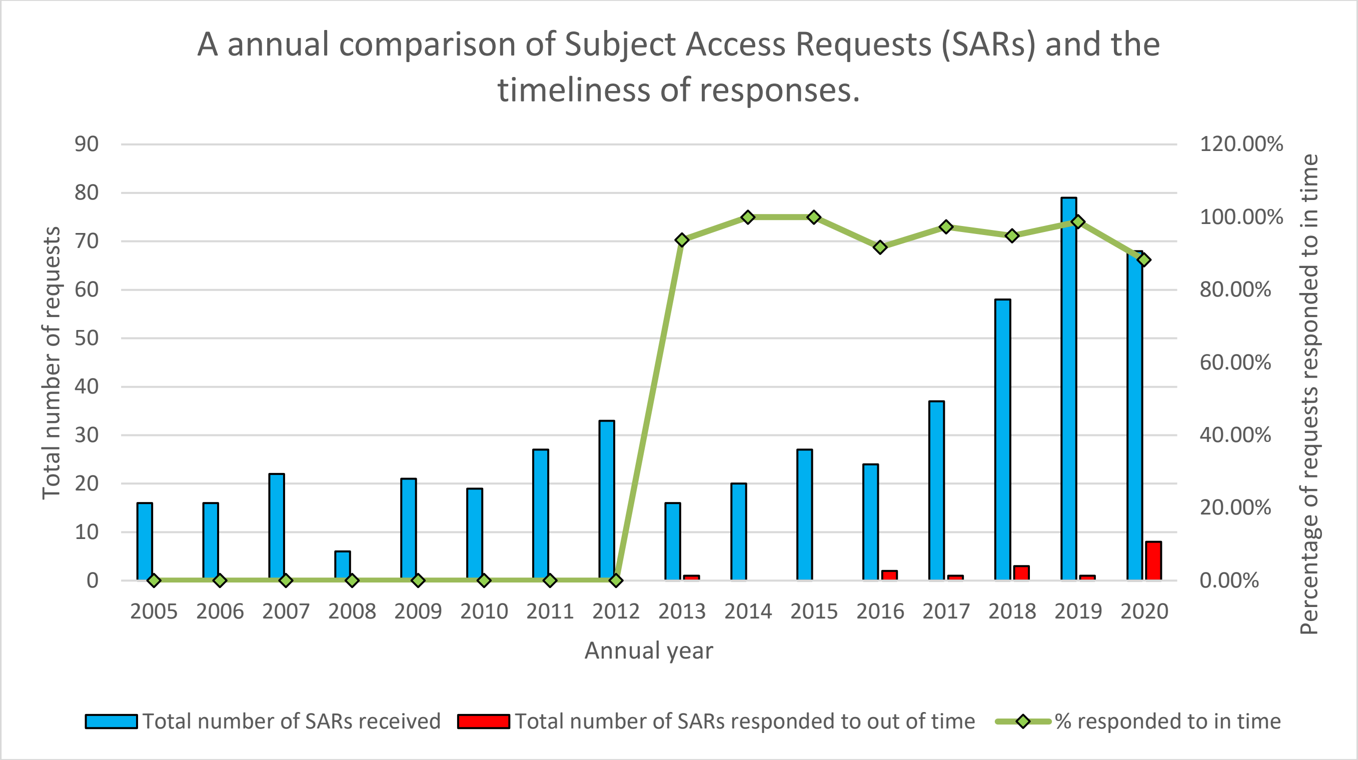
However, the remaining two areas highlighted by Mazars required continued review and were implemented with revised action dates of 31 December 2021.

- A review of the corporate ‘W’ drive.
- A review of the retention policies

These considerations were reviewed and have been incorporated into the relevant departments ongoing work.

**Subject Access Requests**

21. Subject Access Requests (SARs) made under the DP legislation are where the subjects of personal information (‘data subjects’) exercise their right to make requests to be provided with copies of the personal information held about them by a data controller. A data controller has, under the DPA 2018, a calendar month, in which to comply, ie to disclose or apply relevant exemptions or other constraints under the legislation. The CoL received 69 SARs in 2020, under the DPA 2018. Of these, 60 were complied with within the statutory timescale, a compliance rate of 86.95%. A further breakdown can be found at **Appendix three.**



*Please note that no data is held for requests prior to 2013.

22. The 2020 compliance rate has decreased since 2019 from 98.73% to 88.24%. However, it is noted that compliance with SARs were impacted by the wider effects of the Covid-19 pandemic, with departments experiencing increased workloads and additional duties in addition to paper documents being inaccessible as a result of staff working from home during the national lockdowns.

23. Data subjects are also exercising other rights under the new legislation, which rights, while not being greatly different in substance compared with the DPA 1998, have been more publicised as a result of the introduction of the new legislation and considerably more exercised. The updated rights (all subject to caveats and exemptions) are: the right to rectification of purportedly inaccurate personal data; the right to erasure (also known as the 'right to be forgotten'); the right to restriction of processing; right to be informed as to what of their data is being processed; right to data portability, where the data subjects can request that the personal data held on them is transferred to a different company/organisation; the right to object to processing; and the right to object to automated processing, where, should a decision be made without human interaction, the data subject can request that the decision is reviewed by a human.

24. In 2020, under the DPA 2018, the CoL received 79 requests for erasure, 1 request for data portability and 3 requests for rectification (there were no other requests made for any other rights applicable under the DPA 2018). Of these 80 were completed in accordance with the statutory timescale (1 month), a compliance rate of 96.38%.

25. The 2020 total is the highest number of requests made in regard to other data subject rights, in a year since records were first kept in 2018 and is considered to be the result of an increased awareness by data subjects of their rights.

**Complaints**

26. There were 13 complaints received:

- 5 regarding personal data processed as part of the new swimming season tickets for the Hampstead Heath Swimming Ponds (5 partially upheld)
- 3 regarding the use and sharing of personal data (1 not upheld, 1 partially upheld, 1under investigation)
- 2 regarding the response provided to a SAR (1 not upheld-no response received to clarification request, 1 partially upheld)
- 1 regarding a request for personal data to be provided as proof of identification (not upheld)
- 1 regarding the allegation of a data breach (not upheld)
- 1 concerning the use of Zoom to record lessons (not upheld)

**Notifications**

27. In accordance with DP legislation, data controllers are required to notify with the ICO. Under the DPA 2018, the process had been streamlined, in that a detailed description of processing is no longer required. Instead, data controllers register using the set form for the relevant class of data controller into which they fall. A more detailed description is, though, required to be kept by each data controller (please see 'Record of Processing Activities (RoPA)', below). All notifications must be kept up to date and renewed annually with the ICO, for which the ICO levies a charge. The Compliance Team are responsible for maintaining the CoL's notification and that of the Electoral Registration Officer.

**GDPR**

28. **General**: In practice, while the DPA 2018 and GDPR requirements represented a wholesale revision of DP law, it is more a case of degree than kind, putting best practice into law. There is also a reasonableness element in the GDPR, a recognition that compliance can take into account the costs involved, measured against risks. We should not be complacent. As ever, it is important that the CoL takes a corporate, structured approach to compliance which is robust. As mentioned in previous reports, the administrative fines for non-compliance under the GDPR are "up to £17 million, or in the case of an undertaking, up to 4% of the total worldwide annual turnover of the preceding financial year, whichever is higher"[3]. For the purpose of administrative fines, "an undertaking should be understood to be an undertaking in accordance with Articles 101 and 102 TFEU"[4].

29. During 2020, in accordance with the ongoing Brexit negotiations the Compliance Team continued to monitor and provided advice in regards to the EU GDPR while helping departments to prepare for any changes brought about by the Brexit agreement, This included reviewing the geographical location for where personal data is held and then updating any agreements or arrangements that are in place. For example advising that the data is held on a server/cloud based within the United Kingdom, or requesting that departments implement the EU Standard Contractual Clauses for data protection, in all contracts and agreements, as opposed to relying on previous lawful basis i.e. an adequacy decision.

[3] Article 83 of the GDPR

[4] Recital 150 of the GDPR.

30. We note that as of the 1 January 2021, the UK government and EU commission had not agreed on a formal adequacy decision to allow for the transfer of personal data between the UK and EEA countries. As such we continued to monitor the situation as it developed.

It is noted that a formal adequacy decision between the UK and EEA countries was agreed on the 28 June 2021, allowing the transfer of personal data between the UK and the relevant EEA country without any further actions being required. However, it is noted that the formal adequacy decision has been agreed for a period of 4 years, with the view to the agreement potentially being renewed after that time. Also, it should be noted that the adequacy decision can be revoked at any time prior to the 4 years expiring.

31. **Data Protection Officer (DPO)**: As mentioned, Article 37 of the GDPR requires a data controller to have a designated DPO and the Comptroller & City Solicitor is that Officer for the CoL and is also the DPO for the Town Clerk in his role as Electoral Registration Officer, the Town Clerk being a separate data controller from the CoL in that capacity.

32. **Policies and Corporate Privacy Notices**: Following the changes brought about by the EU GDPR, the Compliance team, alongside colleagues within the Comptrollers and AIN reps have continued to review, maintain and where necessary update all the privacy notices and policies in respect of the new and updated activities that the CoL have been undertaking which involved personal data. The Responsibility for these belongs with the Compliance Team and the respective departments.

33. **Record of Processing Activities (RoPA)**: This is the core document in providing an audit of personal data processing, in accordance with Article 30 of the GDPR. The master version created and maintained by the Compliance Team continues to collect additional processing information the recording of which is required under other Articles of the GDPR, with the aim of creating a single, updateable record of the CoL's processing. The RoPA project continues to be managed via the AIN, with the Compliance Team overseeing and providing guidance where required. This is a living document that requires regular updates and review. The Compliance Team hold and update a master version, that we hope to make accessible to all staff.

### Conclusion

34. The processing of personal information is a continuous activity across most of our functions and so we always live with the possibility of ordinary human error. Nevertheless, guidance, training and awareness raising contribute effectively to the CoL's compliance with the DPA 2018. Just one mistake can have considerable implications. Nevertheless, while we should not lower our guard, it can be said that all departments appeared in 2020 to be achieving a good level of compliance with the new legislation.

35. The AIN and other staff across the CoL have reacted very positively to the implementation of GDPR and work hard to ensure that the CoL is compliant with the DPA 2018 and remains so, including in relation to any new processing activities, with enquiries being made to the Compliance Team and Legal staff in the Comptroller & City Solicitor's Department on a daily basis.

Appendices:
Appendix1: CoL – A breakdown of data breaches reported by annual year.
Appendix 2: CoL- A breakdown of statistics for the data protection e-learning programme.
Appendix 3: CoL- A breakdown of statistics for the timeliness of responding to SARs.

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## Appendix 1: CoL- A breakdown of data breaches reported by annual year

| Year | Total breaches reported | Proven | Non-proven (Including lost and stolen devices) | Proven Breaches as a result of a third party |
|---|---|---|---|---|
| 2020 | 100 | 73 | 19 | 8 |
| 2019 | 99 | 52 | 47 | Data not recorded |
| 2018 | 92 | 47 | 45 | Data not recorded |
| 2017 | 28 | 8 | 20 | Data not recorded |
| 2016 | 27 | 9 | 18 | Data not recorded |
| 2015 | 21 | 7 | 14 | Data not recorded |
| 2014 | 27 | 7 | 20 | Data not recorded |
| 2013 | 19 | 10 | 9 | Data not recorded |
| 2012 | 28 | 7 | 21 | Data not recorded |

## Appendix two: CoL statistics for the completion of the Data Protection e-learning programme.

| CoL status | Total | Percentage |
|---|---|---|
| Complete | 3595 | 89.16% |
| In Progress | 76 | 1.88% |
| Not Yet Started | 154 | 3.82% |
| Exempt | 194 | 4.81% |
| Temporary Exempt | 13 | 0.32% |
| **Total** | **4032** | **100.00%** |

Please note that for the following table:

* Please note schools is a combined total, for a further breakdown please see the tab below.

** Those marked temporary exempt will need to complete the training on their return to work

*** The percentage for the overall completion is a combined percentage of those who have completed; been made exempt or marked as temporary exempt.

**** These members of staff are either temporary or contractors, who have not been assigned a department

| Department | Complete | Percentage | In Progress | Percentage | Not Yet Started | Percentage | Exempt | Percentage | Temporary exemption** | Percentage | Totals | Overall completion*** |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Barbican | 389 | 87.42% | 16 | 3.60% | 21 | 4.72% | 11 | 2.47% | 8 | 1.80% | 445 | 91.69% |
| CCC/Mansion House | 144 | 99.31% | 0 | 0.00% | 0 | 0.00% | 1 | 0.69% | 0 | 0.00% | 145 | 100.00% |
| Chamberlain's | 270 | 92.78% | 5 | 1.72% | 15 | 5.15% | 1 | 0.34% | 0 | 0.00% | 291 | 93.13% |
| City Surveyors Department | 244 | 99.19% | 0 | 0.00% | 1 | 0.41% | 1 | 0.41% | 0 | 0.00% | 246 | 99.59% |
| Comptroller's and City Solicitors | 62 | 98.41% | 0 | 0.00% | 0 | 0.00% | 1 | 1.59% | 0 | 0.00% | 63 | 100.00% |
| Department of the Built Environment | 237 | 97.13% | 1 | 0.41% | 5 | 2.05% | 1 | 0.41% | 0 | 0.00% | 244 | 97.54% |
| Department of Communities and Children's Services | 346 | 82.97% | 4 | 0.96% | 15 | 3.60% | 52 | 12.47% | 0 | 0.00% | 417 | 95.44% |
| Guildhall School of Music and Drama | 309 | 89.83% | 11 | 3.20% | 10 | 2.91% | 13 | 3.78% | 1 | 0.29% | 344 | 93.90% |
| Market and Consumer Protection | 255 | 93.75% | 0 | 0.00% | 2 | 0.74% | 15 | 5.51% | 0 | 0.00% | 272 | 99.26% |
| Misc. **** | 0 | 0.00% | 0 | 0.00% | 1 | 100.00% | 0 | 0.00% | 0 | 0.00% | 1 | 0.00% |
| Open Spaces | 356 | 73.86% | 13 | 2.70% | 24 | 4.98% | 88 | 18.26% | 1 | 0.21% | 482 | 92.32% |
| Remembrancers | 33 | 97.06% | 0 | 0.00% | 0 | 0.00% | 1 | 2.94% | 0 | 0.00% | 34 | 100.00% |
| Schools * | 535 | 88.43% | 16 | 2.64% | 45 | 7.44% | 7 | 1.16% | 2 | 0.33% | 605 | 89.92% |
| Town Clerk's Department | 415 | 93.68% | 10 | 2.26% | 15 | 3.39% | 2 | 0.45% | 1 | 0.23% | 443 | 94.36% |
|  | 3595 |  | 76 |  | 154 |  | 194 |  | 13 |  | 4032 |  |

**Appendix 3: CoL- A breakdown of statistics for the timeliness of responding to SARs.**

| Annual Year | Total number of SARs received | Total number of SARs respond to in time | Total number of SARs responded out of time | Percentage of SARs responded to in time |
|---|---|---|---|---|
| 2005 | 16 | | | 0.00% |
| 2006 | 16 | | | 0.00% |
| 2007 | 22 | | | 0.00% |
| 2008 | 6 | | | 0.00% |
| 2009 | 21 | | | 0.00% |
| 2010 | 19 | | | 0.00% |
| 2011 | 27 | | | 0.00% |
| 2012 | 33 | | | 0.00% |
| 2013 | 16 | 15 | 1 | 93.75% |
| 2014 | 20 | 20 | 0 | 100.00% |
| 2015 | 27 | 27 | 0 | 100.00% |
| 2016 | 24 | 22 | 2 | 91.67% |
| 2017 | 37 | 36 | 1 | 97.30% |
| 2018 | 58 | 55 | 3 | 94.83% |
| 2019 | 79 | 78 | 1 | 98.73% |
| 2020 | 68 | 60 | 8 | 88.24% |

- Please note that no data is held prior to 2013.

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| | |
|---|---|
| **Committees:**<br>Digital Services Sub (Finance) Committee | **Dated:**<br>03.09.2021 |
| **Subject:**<br>Freedom of Information Act / Environmental Information Regulations - 2020 Annual Report | **Public** |
| **Report of:**<br>Michael Cogher, Comptroller & City Solicitor | **For Information** |
| **Report author:**<br>Sophie Jordan<br>Compliance Manager – DP & FOI | |

**Summary**

The performance indicators show that the usual high standard of compliance with the legislation was maintained in 2020 both at a corporate and departmental level, despite the impact of Covid-19 on working practices.

Please note, in 2020 the Community Safety Team moved from the Town Clerk's Department to the Department of Communities and Children's Services. As this move took place towards the end of 2020, we have continued to include all statistics for the Community Safety Team within the totals provided for the Town Clerks Department in order to have a complete year. Going forwards from January 2021, any statistics for the Community Safety Team will be reported as part of the overarching statistics for the Department of Communities and Children's Services.

**Recommendation(s)**

Members are requested to note the report.

## Main report

**Introduction**

1. This is the seventh annual report in respect of corporate and departmental compliance with the Freedom of Information Act (2000) (FOIA) and the Environmental Information Regulations (2004) (EIR).

**Background**

2. The FOIA applies to the City of London (CoL) as a Local Authority, Police Authority and Port Health Authority. In addition, the FOIA also applies to the Guildhall School of Music and Drama (GSMD) and has done so since 2006 when it began to receive funding from the Higher Education Funding Council for England. Thereby making GSMD unique in the CoL in being the only area where funding by City's Cash is subject to the FOIA.

3. It is noted that the following three bodies, while associated with the CoL are legally separate for the purpose of compliance with the FOIA: City of London

Police; The Aldgate School and the Museum of London.

4. The EIRs are a similar regime to the FOIA, but they relate to environmental information, which is considered as exempt under the FOIA and requests for this information are managed separately under the EIR legislation. In accordance with, and subject to further legal advice the EIRs are taken to apply to the same areas to which the FOIA applies, and in addition to our City's Cash funded Markets and Open Spaces.

5. The definition of a request under the FOIA is broad potentially covering every request for information that is received regarding our within-scope functions. However, a pragmatic approach is permitted, and the legislation is not intended to replace existing business as usual processes that are routinely providing information. As such the FOIA will only need to be engaged when information is being requested, which is not already routinely disclosed, or when a request requires a search for information to an unusual extent.

6. Co-ordination of the compliance work is undertaken by the Compliance Team – Data Protection and Freedom of Information, who are based in the Comptroller and City Solicitor's Department.

7. The Compliance Team report to the Comptroller and City Solicitor who is also the CoL's Senior Information Risk Officer (SIRO) and the Data Protection Officer (DPO).

8. To assist with departmental responsibility and corporate co-ordination an Access to Information Network (AIN) was established in 2003 with one or more representatives (AIN Reps) established in every department. This followed a report by the Town Clerk and Comptroller and City Solicitor[1] in November 2002 and was subsequently reiterated in a further report by the Town Clerk to the Committee in July 2004[2]. The duties of an AIN were formalised in a memo in 2003[3] and consist, in summary of assisting in ensuring all aspects of compliance within their areas with the FOI, EIR, Data Protection Act 2018 (DPA) and Re-use of Public Sector information (RePSI) legislations.

### Impact of requests

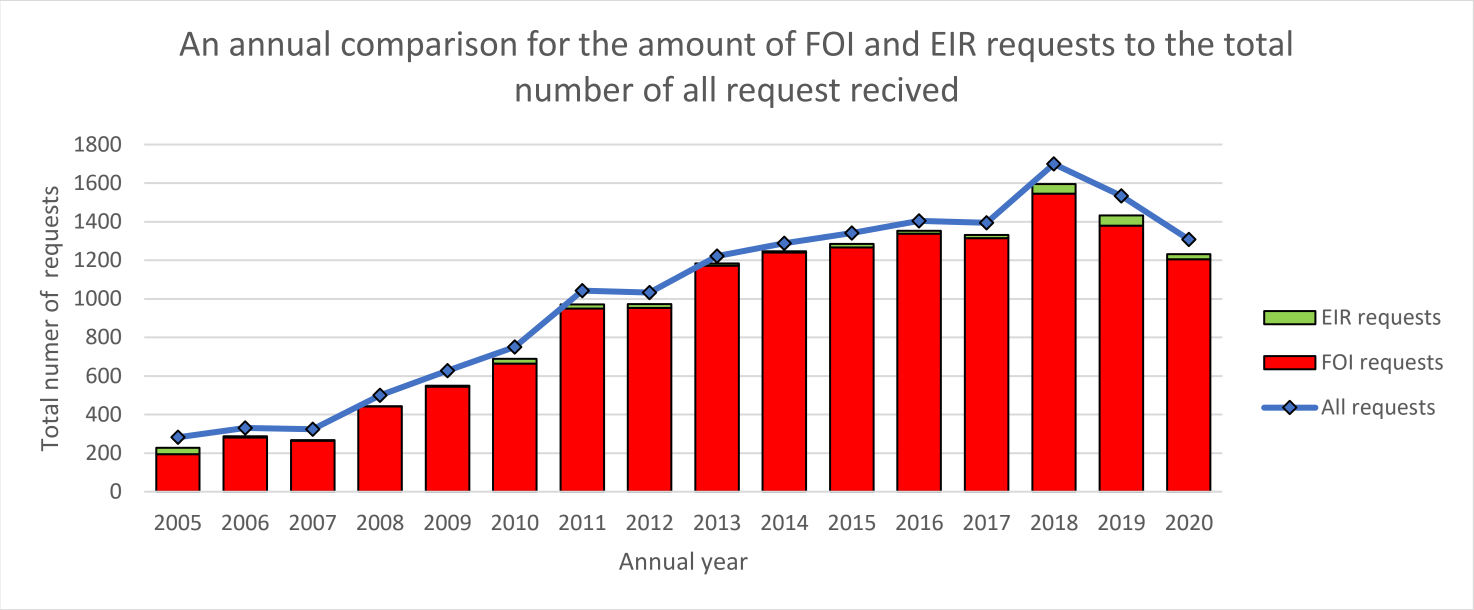
9. In the 2020 annual year, the CoL received a combined total of 1,231 FOI and EIR requests, out of a total of 1,308 for all requests[4] received. Please see **appendix one** for a further breakdown.

[1] November 2002 Policy and Resource Committee Report.

[2] July 2004 -Policy and Resource Committee

[3] Memo for AIN role 2003

[4] All requests received refers to a combined total of Data Protection, Re-Use of Public Sector Information requests as well as FOI EIR and Out of Scope requests.



10. It is noted that from 2005 to 2020, 2.11% of the total of FOI/EIRs requests were managed under the EIR legislation.

11. For the 2020 annual year, the CoL experienced a decrease of 14.12% in the amount of FOI and EIR requests that were received, and a decrease of 14.67% in the total number of all requests received, when compared to the 2019 annual year. The latter represents a decrease of 225 requests during this year. It is considered that the decrease of requests received during the 2020 period, was a by-product of the Covid-19 pandemic, as fewer requests were received in the months following the first national lockdown, (March 2020).

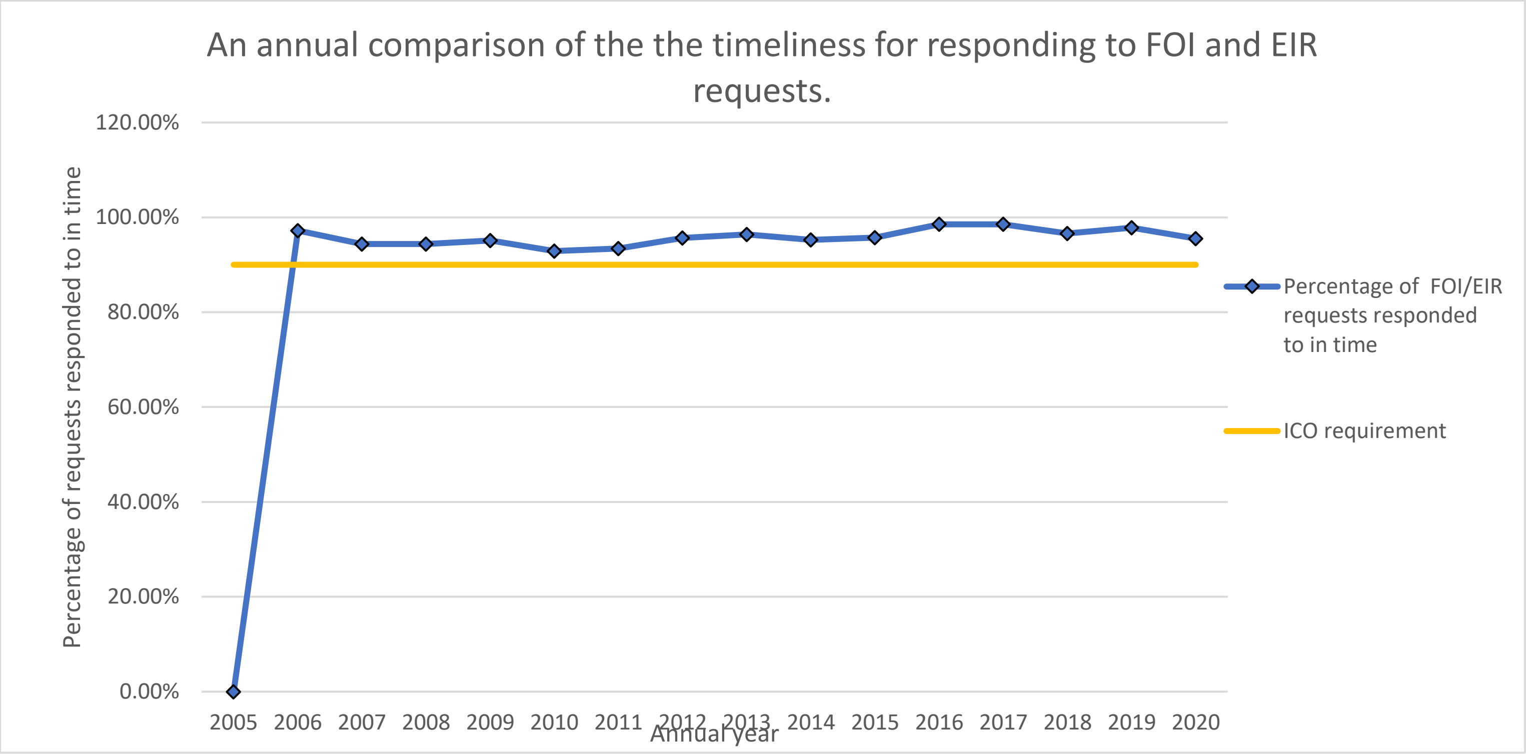
12. On average, the CoL received 109 requests (a combined total of FOI, EIR, Data Protection, RePSI and Out of Scope) per month in 2020.

**Performance**

13. The regulatory body, the Information Commissioner’s Office (ICO) considers that the key performance indicator is the compliance with the statutory 20 Working days deadline for both FOI and EIR requests. It is noted that the ICO would intervene to monitor an authority where it was aware that its compliance rate had fallen below 90%.

14. The CoL’s record on meeting the deadline has been consistently high and in the 2020 annual year, it responded to 95.53% of requests within the statutory

compliance deadline. The following graph demonstrates the CoL's position on meeting the statutory deadline.



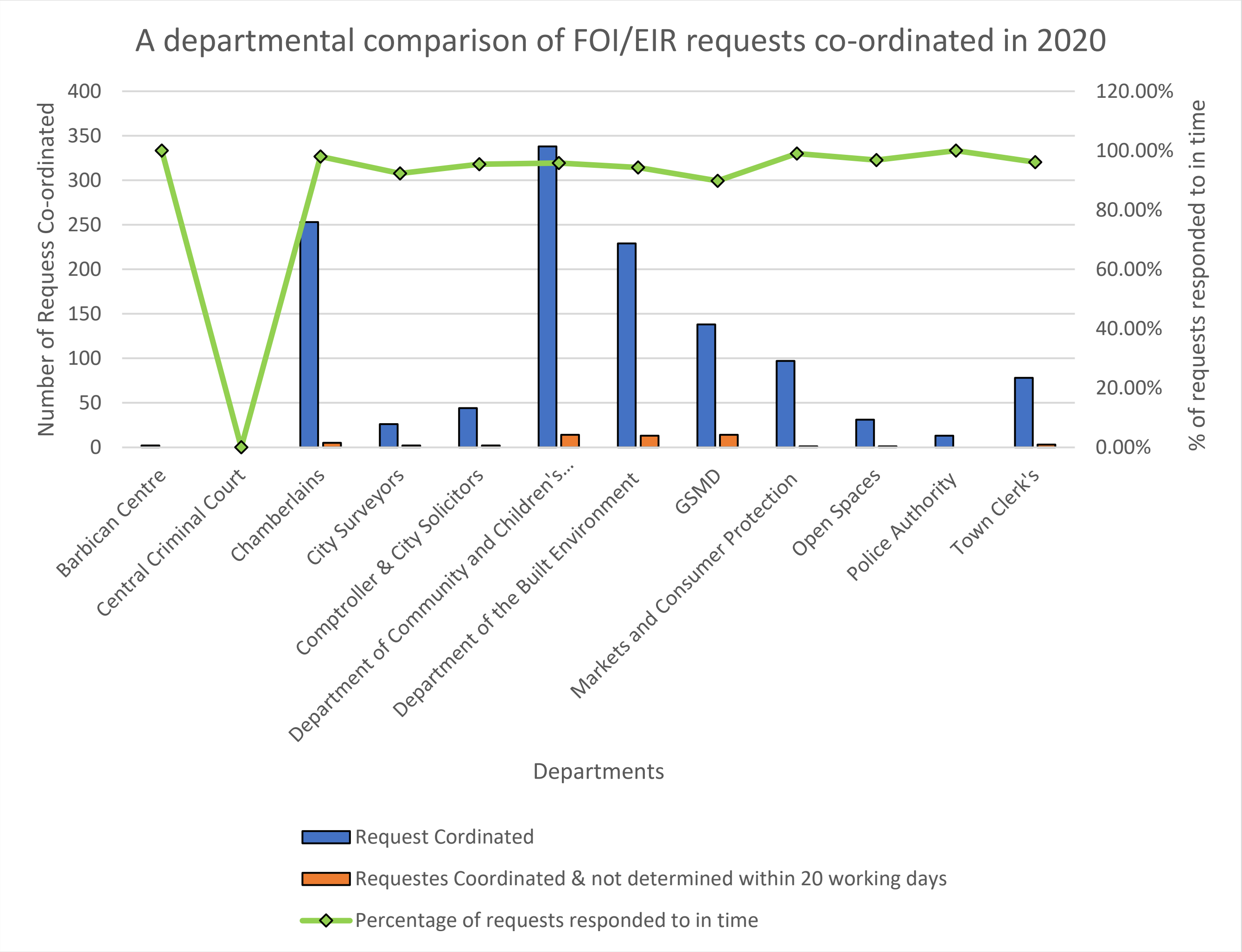
*Please note that no data is held for 2005.

15. It is noted that the total of 95.53% of requests responded to in time, is a slight decline from the 97.90% reported in the 2019 annual year. However, we consider that this decrease was again a by-product of the Covid-19 Pandemic, which had an impact on both the ability for us to gain access to some of the requested information and the increased workloads of staff members while they undertook additional duties in relation to the pandemic.

16. The table at **appendix 2**, provides further information in respect of the average number of working days taken to respond to the request, the average hours to manage each request and the number of full-time equivalent (FTE) staff involved.

17. The robust results reflect the continuing build-up of expertise within departments, under central guidance and supervision. It is a strong indication that the embedding expertise within departments through the AIN, continues to work well and is a key strength of our compliance process.

18. The following graph demonstrates some of the key indicators of departmental performance in 2020. A further breakdown can be seen at **appendix 3.**



19. The Col publishes annually the number of requests it receives and a considerable number of related performance indicators. It also publishes (redacted of any personal data) the log which is used by the Compliance Team to monitor compliance.

20. It is difficult to find compliance information for other authorities. However, where these have been available from time to time, it has been clear that the CoL has been in the top band for compliance. At the time of writing we have been unable to compare our compliance with other London Authorities.

**Complaints**

21. Complaints usually relate to the non-disclosure of information, rather than late or overlooked responses. Each year, about 70% of requests received result in the full disclosure of information. With the remaining 30% being cases where information is either fully or partially refused, where the appropriate limit[5] is applied, the request is withdrawn or are for the sort of information that the CoL

[5] The appropriate limit refers to a request where the time spent or cost in responding to the request would exceed either 18 hours or £450. In this instance the requests are refused in accordance with s12 of the FOIA.

would not hold.

22. In 2020 there were 17 complaints received concerning request responses, (1.38% of request received), a comparison with previous years is held at **appendix 4**. Of the 17 complaints, 15 were not upheld (88%) and 2 were partly upheld (22%).

23. For the period 2005-2020 the CoL has experienced 32 appeals by applicants to the ICO and so far, the CoL has never challenged the outcomes. Of the 32 appeals 6 were upheld, 5 were partly upheld and 21 were not upheld.

24. It is noted that there is no legal deadline for responding to a FOI/EIR complaint, however, to prevent the abuse of this, the ICO prescribed that complaints should be dealt within, 20 working days. For the 2020 period 11 of the 17 complaints were managed within that period (64.70%).

25. Appeals can be made to the information tribunal (a two-tier court) about any decision made by the Commissioner. Since 2005 the CoL has experienced 10 appeals to the Tribunal by applicants in cases where the ICO has upheld the CoL's position. Of these 2 were upheld and 8 were not upheld.

**Enforcement**

26. The ICO is responsible for monitoring and investigating compliance with the legislation by public authorities. With reference to FOI and EIR compliance the ICO's key trigger would be in instances where an authority is responding to less than 90% of requests within the 20 working days statutory deadline. The ICO's investigations can last several months and an authority may be issued with an Undertaking requiring compliance measures to be in place by stated deadlines. Additionally, where failings are persistent the ICO can issue an enforcement notice. Failure to comply with the enforcement notice can result in civil proceedings in the High Court, where the authority can be dealt with as if it had committed contempt of court.

27. To date the CoL has never been investigated by the ICO or received any undertaking or other enforcement notice in respect of FOI compliance.

**Training and Guidance**

28. Since the introduction of the FOIA and EIRs, considerable guidance for staff and Members has been provided within the Access to Information pages set up on the intranet. More recently, the compliance team have also established a Microsoft Teams site for all AIN representatives, providing a further channel for advice and guidance.

29. A FOI e-learning package was first introduced in 2004 and then subsequently updated in 2016. The e-learning package is available for all staff members to complete.

30. AIN representatives are asked to complete the FOI e-learning package and are provided with one-to-one training on becoming a representative. This is in addition to further advice and guidance provided by the Compliance Team on a case by case basis, regarding any specific queries relating to requests received.

**Monitoring**

31. The CoL's compliance with FOI/EIRs is continually monitored by the Compliance Team. In October 2019 an external FOI compliance audit was undertaken by Mazars, and finally concluded in February 2020, upon receipt of the final report. The final report from Mazars found that the CoL had achieved substantial assurance with FOI (having secured a control environment with risk to system objects being reasonably managed). One low priority recommendation was raised in respect of updating and reviewing the FOI documents held on the CoL's internet and intranet.

32. Internal Audit undertook a further review of this recommendation in October 2020 and revised the deadline for completing this activity to 31 March 2021. It is noted that due to the impact of Covid-19 on our workloads there has been slow progress made on this recommendation.

**Records Management**

33. While it is not the role of the Compliance Team to ensure efficient records /information management at a corporate or departmental level. It is however noted that ensuring the management of all information can and does have an impact on the CoL's ability to respond to any request received. Section 46 of the FOIA provides requirements on all authorities to ensure that a reasonable standard of records management (in all media) is maintained, with investigation and enforcement action being possible. This is to prevent the work undertaken in respect of the FOI/EIRs being undermined by poor records management and to ensure that any refusal under the 'appropriate limit' is reasonable.

**Conclusion**

34. The performance indicators, the relatively low number of complaints and the absence of any enforcement action by the Information Commissioner, demonstrates that FOI/EIR compliance has been consistently managed to a high standard across the CoL.

**Appendices:**

Appendix 1: CoL – Annual request totals 2005 -2020
Appendix 2: CoL-20 Working Days Deadline, FTEs etc, 2005-2020
Appendix 3: CoL Departments – Key Indicators 2020
Appendix 4: CoL- Complaints, 2005-2020

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## Appendix 1: CoL – Annual request totals 2005-2020

| Year | FOI & EIRs requests only | All requests* |
|---|---|---|
| 2005 | 228 | 282 |
| 2006 | 288 | 330 |
| 2007 | 267 | 324 |
| 2008 | 443 | 500 |
| 2009 | 549 | 627 |
| 2010 | 689 | 750 |
| 2011 | 971 | 1,042 |
| 2012 | 972 | 1,033 |
| 2013 | 1,184 | 1,222 |
| 2014 | 1,247 | 1,288 |
| 2015 | 1,284 | 1,342 |
| 2016 | 1,353 | 1,405 |
| 2017 | 1,331 | 1,394 |
| 2018 | 1,595 | 1,699 |
| 2019 | 1,432 | 1,533 |
| 2020 | 1,231 | 1,308 |

*The all column shows the total number of FOI/EIRs, ‘Out of Scope’ requests, Subject Access Requests (SARs) and requests under RPSI.

## Appendix 2: CoL – 20 Working Days Deadline, FTEs, etc, 2005-20

| Year | No. of FOI/ EIRs Re- quests | Responded to within the statutory 20 working days | Average working days per request | Hours per RFI | FTEs (1 FTE = 1,540 hours) |
|---|---|---|---|---|---|
| 2005 | 228 | N/A | N/A | 9.42 | 1.39 |
| 2006 | 288 | 97.22% | N/A | 6.65 | 1.24 |
| 2007 | 267 | 94.38% | 13 | 8.04 | 1.39 |
| 2008 | 443 | 94.35% | 13 | 5.74 | 1.65 |
| 2009 | 549 | 95.08% | 15 | 6.61 | 2.35 |
| 2010 | 689 | 92.88% | 13 | 6.41 | 2.87 |
| 2011 | 971 | 93.40% | 14 | 5.44 | 3.43 |
| 2012 | 972 | 95.67% | 13 | 5.83 | 3.68 |
| 2013 | 1,184 | 96.36% | 12.16 | 5.19 | 3.99 |
| 2014 | 1,247 | 95.26% | 13.37 | 5.10 | 4.13 |
| 2015 | 1,284 | 95.71% | 12.97 | 4.20 | 3.50 |
| 2016 | 1,353 | 98.52% | 11.72 | 3.71 | 3.26 |

|  |  |  |  |  |  |
|---|---|---|---|---|---|
| 2017 | 1,331 | 96.62% | 12.07 | 3.75 | 3.24 |
| 2018 | 1,595 | 97.80% | 11.99 | 3.70 | 3.83 |
| 2019 | 1,434 | 97.90% | 13.08 | 4.40 | 2.71 |
| 2020 | 1,231 | 95.53% | 13.95 | 2.51 | 2.01 |

## Appendix 3: CoL Departments – Key Indicators, 2020

| FOI & EIRs Performance Indicators 2020 | Requests Coordinated | Requests Coordinated & not Determined within 20 Working Days | Working Days per Request Coordinated | Hours for all Requests+ | Average hours per request | Complaints Upheld | Complaints Partly Upheld | Complaints not Upheld |
|---|---|---|---|---|---|---|---|---|
| **Barbican Centre** | 2 | 0 | 0 | 8 | 4 | 0 | 0 | 0 |
| **Built Environment** | 229 | 13 | 21 | 679 | 2.96 | 0 | 2 | 3 |
| **Central Criminal Court** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Chamberlain's** | 253 | 5 | 12 | 378 | 1.49 | 0 | 0 | 3 |
| **City Surveyor's** | 26 | 2 | 5 | 146 | 5.61 | 0 | 1 | 0 |
| **Community & Children's Services** | 338 | 14 | 22 | 710 | 2.10 | 0 | 0 | 5 |
| **Comptroller & City Solicitor's** | 44 | 2 | 4 | 115 | 2.61 | 0 | 0 | 0 |
| **GSMD** | 138 | 14 | 15 | 479 | 3.47 | 0 | 0 | 0 |
| **Markets & Consumer Protection** | 97 | 1 | 10 | 310 | 3.19 | 0 | 0 | 1 |
| **Open Spaces** | 31 | 1 | 1 | 37 | 1.19 | 0 | 0 | 0 |
| **Police Authority** | 13 | 0 | 0 | 16 | 1.23 | 0 | 0 | 0 |
| **Town Clerk's** | 78 | 3 | 10 | 316 | 4.05 | 0 | 0 | 2 |
| | | | | | | | | |
| **Totals** | 1,231 | 55 | 8.33 | 3,203 | 2.65* | 0 | 3 | 14 |

+ This is the number of hours spent on requests, whether the department coordinated the response or assisted another department with the request.

* This average departmental figure excludes the additional time taken to give advice and assistance to departments by the Compliance Team and other staff in the Comptroller & City Solicitor's Department. When this time is included, the corporate average is 4.13 hours.

## Appendix 4: CoL – Complaints, 2005-19

| | Number of FOI/EIRs requests | Number of Complaints | Complaints as a % of the number of requests received |
|---|---|---|---|
| **2005** | 228 | 5 | 2.19% |
| **2006** | 288 | 0 | 0% |
| **2007** | 267 | 5 | 1.87% |
| **2008** | 443 | 2 | 0.45% |
| **2009** | 549 | 10 | 1.82% |
| **2010** | 689 | 23 | 3.33%* |
| **2011** | 971 | 3 | 0.30% |
| **2012** | 972 | 14 | 1.44% |
| **2013** | 1,184 | 15 | 1.26% |
| **2014** | 1,247 | 7 | 0.56% |
| **2015** | 1,284 | 12 | 0.93% |
| **2016** | 1,353 | 14 | 1.03% |
| **2017** | 1,331 | 14 | 1.05% |

| | | | |
|---|---|---|---|
| **2018** | 1,595 | 14 | 0.87% |
| **2019** | 1,432 | 7 | 0.48% |
| **2020** | 1,231 | 17 | 1.38% |

***** The high percentage of complaints received by the CoL during the period 2009-2010 was the result of a campaign of requests on a specific issue received by the CoL, responses to which were routinely complained about by the applicants.

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# Agenda Item 9

| | |
|---|---|
| **Committee**<br>Digital Services Sub (Finance) Committee | **Dated:**<br>3rd September 2021 |
| | |
| **Subject:** Social Value Update | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | **3, 5, 8** |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **£** |
| **What is the source of Funding?** | **N/A** |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | **N/A** |
| **Report of:** Chief Operating Officer | **For Information** |
| **Report author:** Sam Collins | |

## Summary

This paper outlines the key activities of the Social Value Workstream, which forms part of the new IT Managed Service Contract with Agilisys. The key deliverables of the workstream are listed below. Progress will be monitored and reported back to the Digital Services Sub Committee annually.

## Recommendation(s)

Members are asked to note the contents of this report.

## Main Report

### Background

1. The Responsible Business Strategy 2018-23 states that the City of London Corporation should apply our responsible business principles to our procurement procedures to maximise social value, minimise environmental impact and strive to ensure the ethical treatment of people throughout our supply chains

2. The Strategy further states that through our business activities, we will create pathways to fulfilling employment in our organisation by providing and supporting opportunities such as volunteer roles, work experience placements, apprenticeships and graduate schemes.

**Current Position**

3. The current IT Managed Service Contract, awarded to Agilisys, commenced on 1st January 2021. The Social Value Workstream, which formed a key part of the tender evaluation, was delayed due to the Coronavirus Pandemic, however this work is now progressing.

4. The key deliverables for the social value workstream are as follows;

   a) **Apprenticeships** - Create 3 Digital Level 4 apprenticeship positions per year.

   b) **Work placements for young people -** Provide work experience placements for the local youth up to a maximum of two weeks per placement, 2 people per placement

   c) **Work placements for adults -** Supporting the Brokerage Summer Placement Programme, provide placement opportunity for paid interns (London Living Wage) and provide work experience placements for local adults up to a maximum of two weeks per placement.

   d) **Digital inclusion workshops -** Invest in digital development for the youth of all genders to provide digital job-based skills for 60 young people each year

   e) **Education/ careers visits -** Provide careers advice, guidance and opportunities for work experience for local schools

   f) **Cyber security/ digital skills workshop(s) -** Provide introductory Cyber Security overview training to enhance Cyber Security awareness within the community

5. Representatives from the IT Division and wider City Corporation will continue to work with Agilisys to progress these initiatives, with monthly review meetings to monitor delivery. An annual report will be presented to the Digital Services Sub Committee, outlining progress against the workstream deliverables.

**Conclusion**

6. Members are asked to note the contents of this report.

**Appendices**

None.

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| | |
|---|---|
| **Committee**<br>**Digital Services Sub Committee** | **Dated:**<br>3rd September 2021 |
| | |
| **Subject:** Modern.Gov App Pilot Evaluation | **Public** |
| **Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?** | **9** |
| **Does this proposal require extra revenue and/or capital spending?** | **N** |
| **If so, how much?** | **£** |
| **What is the source of Funding?** | **N/A** |
| **Has this Funding Source been agreed with the Chamberlain's Department?** | **N/A** |
| **Report of:** Chief Operating Officer | **For Decision** |
| **Report author:** Sam Collins | |

## Summary

This paper provides a summary of the findings from the Modern.Gov mobile application pilot for the management of committee papers. Overall Members were positive on the use of the Modern.Gov mobile app and on a future move to paperless ways of working. Concerns were raised around the limitations of the application, however only one respondent stated that they would not recommend the application to fellow Members.

## Recommendation(s)

Members are requested to note the evaluation findings and confirm next steps.

## Main Report

### Background

1. The Modern.Gov software, provided by Civica, is used by Committee Services for the collation and publication of agenda packs for all City of London Corporation Committees. It is a market leading solution for governance and meeting management in the public sector and is used by 76% local authorities in England and Wales.

2. The software provides functionality for the entire lifecycle of committee papers, including the collation of electronic document packs by Committee Services, the publication of papers for consumption by members of the public and the distribution and management of committee papers to Members and Officers.

3. This final element of the functionality is provided through a mobile application, which can be downloaded and configured for ios and Windows devices. The software allows meeting attendees to manage their meeting papers, including the ability to annotate and make electronic notes. The original version of the mobile application was not well received within the City Corporation, however Civica have released an updated and improved mobile application which provides additional functionality.

4. The Digital Services Sub Committee requested a pilot of the Modern.Gov mobile application to evaluate its potential in moving the City Corporation to more paperless ways of working for committees.

**Current Position**

5. 37 Members volunteered to take part in the pilot, including the Chair and Deputy Chair of the Digital Services Sub Committee. The pilot began in May, with Members invited to attend a training session held by the Technology Support Team, as well as a one to one appointment, to install and configure the mobile application. Members of the pilot were invited to feedback on their experience of using the application through a survey.

6. Responses were received from 8 Members, with the findings summarised as follows;

   a. All responders confirmed that they had managed to use the Modern.Gov app and that they found it was easy to use (scoring 3.63 out of 5).

   b. Having all papers in one location and the ability to annotate them were noted as the most useful features.

   c. The general stability of the app and ‘crashing’ was noted as the most significant problem, as well as bandwidth issues and difficulties logging in.

   d. 6 out of 8 of the responders had attended a training session and all those that attended found it useful. Members commented that the training should also cover the limitations of the app, as well as the features, including other software options for annotating documents.

   e. 5 out of the 8 responders were very positive that they would recommend the Modern.Gov app to a fellow Member, with one neutral and two against.

   f. All responders were very supportive of a digital engagement programme, with a move to paper-free ways of working (scoring it 4.38 out of 5).

**Options**

7. The Digital Services Sub Committee is asked to review the findings of the Modern.Gov mobile application pilot and confirm how they would like to proceed. The available options could include;

   a) Pursue Member agreement to move to paperless committee meetings, supported by the Modern.Gov application. Members would be required to move to electronic agenda packs only, with printed papers provided only by exception.

   b) Continue to encourage Members to use the Modern.Gov in place of printed committee papers, however this is not mandated.

   c) Do not progress with the use of the Modern.Gov application at the current time.

8. Members should note that any further rollout of the Modern.Gov application would need to be carefully managed and properly resourced given the requirement for configuration, installation and training.

**Sam Collins**
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T: 020 7332 1504

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Agenda Item 11

| | |
|---|---|
| **Committee(s)** | **Dated:** |
| Digital Services Sub Committee – For Information | 3rd September 2021 |
| **Subject:**<br>IT Corporate Risks and Risk Appetite Deep Dive | **Public** |
| **Report of:**<br>The Chief Operating Officer | **For Decision** |
| **Report author:**<br>Sean Green – IT Director | |

## 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.

IT currently holds 2 risks on the Corporate Risk Register and 2 risks on the departmental risk register.

The City of London Corporation (CoLC) has a Risk Management Policy and Strategy that was reviewed and endorsed by the Audit and Risk Committee in May 2021.

The Digital Services Sub Committee have determined that they would like to review the two critical corporate IT risks in the context of risk appetite. This deep dive reviews the methodology for risk appetite and the two corporate risks in the context of a suggested risk appetite statement.

The approach to the determining risk appetite has been informed by the CoLC Risk Management Policy and Strategy and the City of London Risk Appetite Statement.

## Recommendation(s)

Members are asked to:

- Note the report and agree a statement that describes their risk appetite as a committee to guide the IT Director and his team in the treatment of Information and Security risks.

## Main Report

### Background

1. CoLC is responsible for ensuring that its business is conducted in accordance with the law and proper standards of governance; that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively; and that arrangements are made to secure continuous improvement in the way its functions are operated.

2. In discharging this overall responsibility, CoLC is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk.

3. The Digital Services Sub Committee (DSSC) have been actively involved in reviewing and scrutinising the critical IT Corporate and Departmental risks providing for the last 5 years providing challenge and supporting mitigating actions most notably with the ongoing investment and oversight required for CR16 the IT Security risk.

4. The IT Division currently holds 2 corporate risks, which are not scored as Red. All risks have owners, clear actions, with target dates to enable focussed management, tracking and regular and consistent reviews.

5. The number of IT risks has increased over the last 12 months from 6 to 10 see Appendix A.

6. This report is a deep dive to help DSSC review two corporate risks that the committee monitor in the context of risk appetite.

**Risk Appetite**

7. When considering threats, risk appetite involves assessing the level of exposure that can be justified and tolerated by comparing the cost (financial or otherwise) of mitigating the risk with the cost of the exposure if the risk crystallises into an issue and finding an acceptable balance.

8. Target risk **–** The risk score that the organisation wishes to reduce the risk to (i.e., target risk score) after the completion of all related actions and achieved by a certain date.

9. Risk Appetite: the level of risk with which an organisation aims to operate.

10. The benefits of adopting a risk appetite include:

- Supporting informed decision-making;
- Reducing uncertainty;
- Improving consistency across governance mechanisms and decision-making;
- Supporting performance improvement;
- Focusing on priority areas within an organisation; and
- Informing spending review and resource prioritisation processes.

11. Description of Risk Appetite Levels

| Appetite Levels | Description |
|---|---|
| Averse<br>(Low) | Avoidance of risk and uncertainty is a key objective. |
| Minimalist<br>(Medium-Low) | Preference for ultra-safe options that have a low degree of inherent risk and only have a potential for limited reward. |
| Cautious<br>(Medium) | Preference for safe options that have a low degree of residual risks and may only have limited potential for reward. |
| Open<br>(Medium-High) | Willing to consider all options and choose the one that is most likely to result in successful delivery while also providing an acceptable level of reward. |
| Hungry<br>(High) | Eager to be innovative and to choose options based on potential higher rewards (despite greater inherent risk). |

## Implications

12. The level of the risk appetite provides specific guidance officers, project owners and risk owners.

13. Risk appetite indicates to risk owners the extent to which they need to mitigate risks.

14. Risk appetite guides risk owners in the organisation; to whom the risks may be escalated to and, in the types and levels of risk they can accept on behalf of the organisation.

15. Risk appetite maps to a maximum level of residual risk that can be accepted on behalf of CoLC at each level in the risk management chain. (See tables below).

| **Residual Risk Level** | **Risk appetite** | | | | |
|---|---|---|---|---|---|
| | **Risk Averse** | **Minimalist** | **Cautious** | **Open** | **Hungry** |
| **Green** | CISO | IAO | IAO | IAO | IAO |
| **Amber** | CISO | CISO | CISO | IAO | IAO |
| **Red** | SIRO | SIRO | SIRO | SIRO | CISO |

| **Residual Risk Level** | **Risk appetite** | | | | |
|---|---|---|---|---|---|
| | **Risk Averse** | **Minimalist** | **Cautious** | **Open** | **Hungry** |
| **Very Low** | IRO | IAO | IAO | IAO | IAO |
| **Low** | SIRO | IRO | IAO | IAO | IAO |
| **Medium** | SIRO | CISO | IRO | IAO | IAO |
| **Medium-High** | SIRO | SIRO | CISO | IRO | IAO |
| **High** | SIRO | SIRO | SIRO | SIRO | IRO/CISO |
| **Very High** | SIRO | SIRO | SIRO | SIRO | CISO |

16. Key themes for risks that this committee are responsible for:

    - Technology risks – Risks arising from technology not delivering the expected services due to inadequate or deficient system/process development and performance or inadequate resilience.

    - Information risks – Risks arising from a failure to produce robust, suitable and appropriate data/information and to exploit data/information to its full potential.

    - Security risks – Risks arising from a failure to prevent unauthorised and/or inappropriate access to key government systems and assets, including people, platforms, information and resources. This encompasses the subset of cyber security.

    - Project/Programme risks – Risks that change programmes and projects are not aligned with strategic priorities and do not successfully and safely deliver requirements and intended benefits to time, cost and quality.

    - Reputational risks – Risks arising from adverse events, including ethical violations, a lack of sustainability, systemic or repeated failures or poor quality or a lack of innovation, leading to damages to reputation and or destruction of trust and relations.

**Suggested Risk Position of IT Security and Information Management Risks (See Appendix B)**

17. DSSC has a low to moderate appetite in relation to technology and information risk. This risk appetite applies to both the CoLC's' technology networks; cloud-based applications used to support delivery of services; and processes where manual documents are used and retained.

18. This risk appetite will vary depending on the nature; significance; and criticality of systems used, and the services that they support.

19. Target risk is managed through ongoing use of inbuilt technology security controls such as user access; encryption; data loss prevention; firewalls; and ongoing vulnerability scanning and a range of technology security protocols and procedures.

20. CoLC is now progressing towards full alignment to 'Best' recommendations from the National Cyber Security Centre for Cyber resilience with the implementation of Microsoft E5 licences.

21. Directors and Officers are responsible for ensuring ongoing compliance with technology security protocols, policies, standards and procedures.

**Next steps**

22. Review or amend and then adopt the risk appetite statement in this report as a guidance for Director of IT and his team.

23. Ensure that IT continue to deal with Risks in a dynamic manner

24. Continue to seek assurance that IT management processes, including Change Management, Problem Management, Continuous Improvement and Incident Management will all reference or identify risk to ensure that Division risks are identified, updated and assessed on an ongoing basis.

25. Note that the risk appetite statement for Officers is being reviewed by the new Executive Leadership Board in October 2021.

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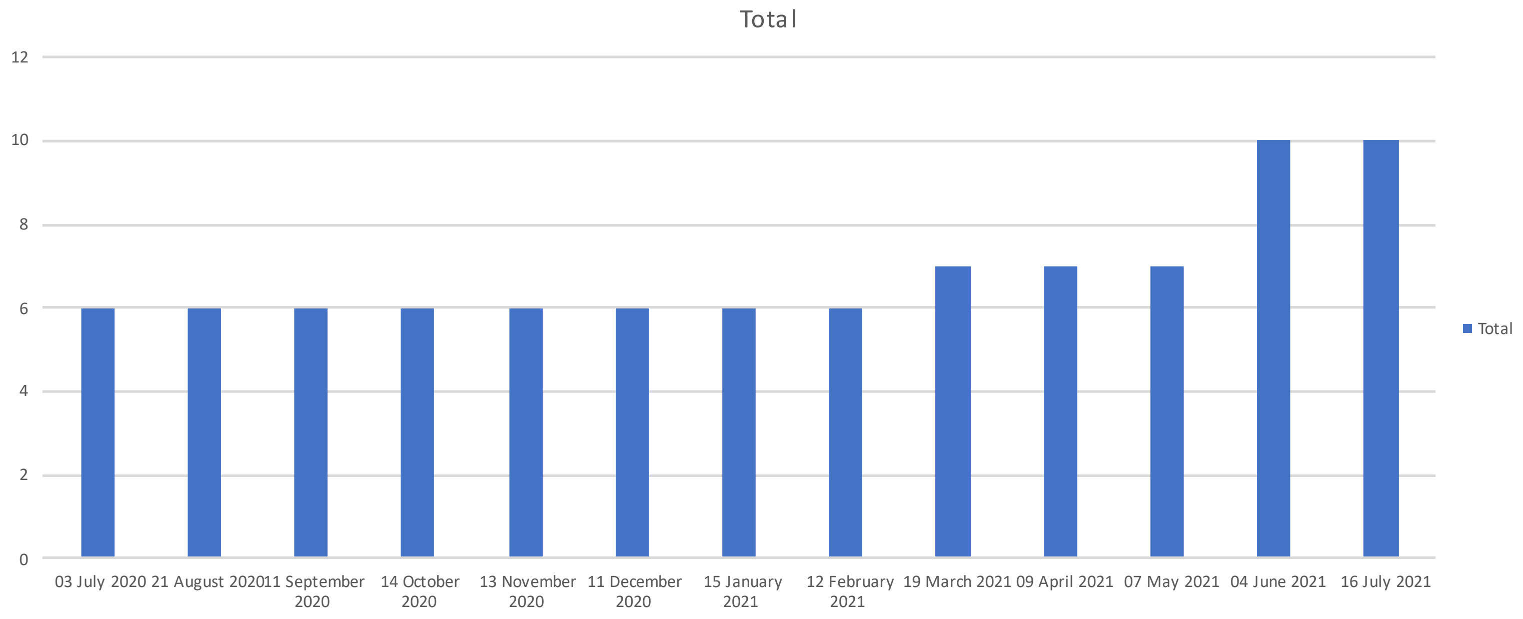
**Appendences**

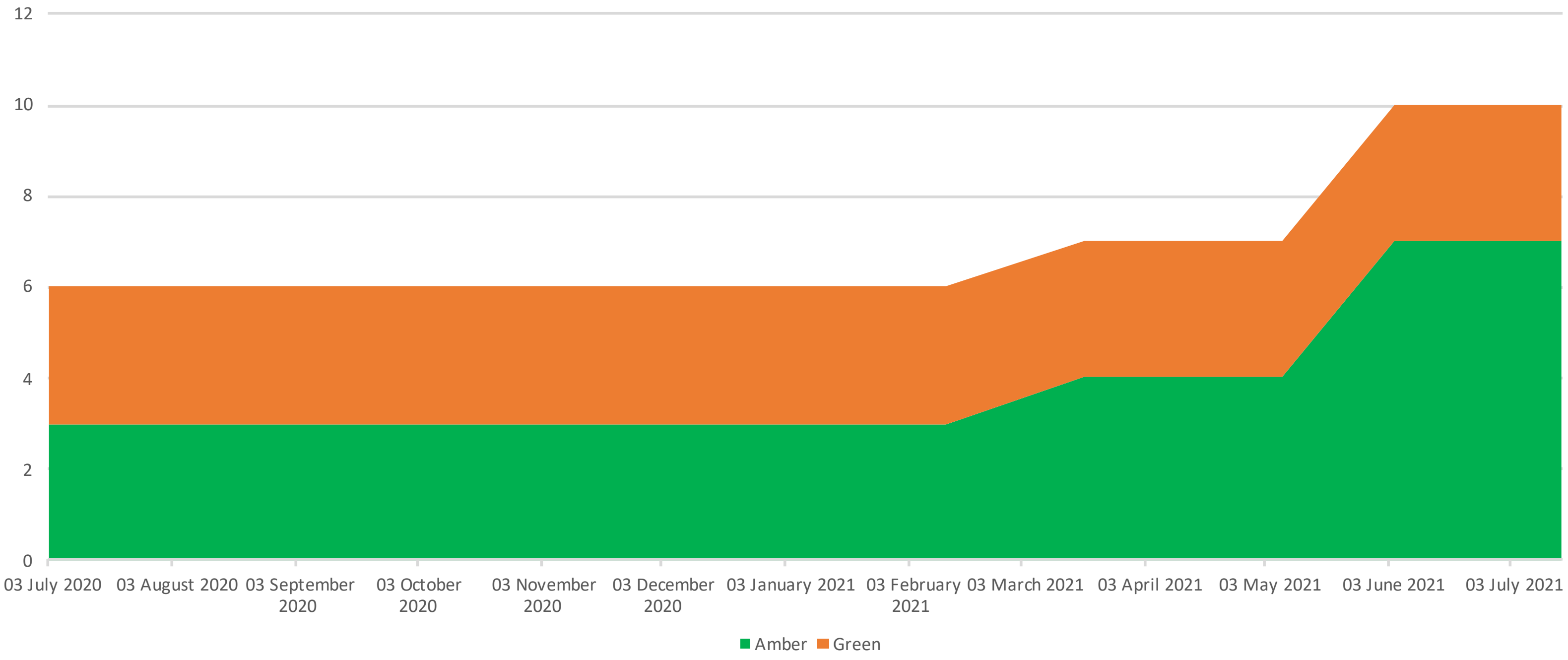
Appendix A – IT Risks Analysis
Appendix B- IT Corporate and Departmental Risks

## Appendix A – IT Risks Analysis

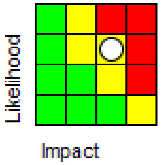
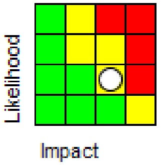
# No of IT risks since July 2021

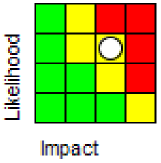
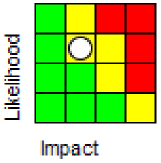


# Amber /Green Risks July 2020 to July 2021



# APPENDIX B - CHB IT All CORPORATE & DEPARTMENTAL RISKS

| Risk no, title, creation date, owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date/Risk Approach | Current Risk score change indicator |
|---|---|---|---|---|---|---|---|---|
| **CR16 Information Security (formerly CHB IT 030)**<br>10-May-2019<br>Caroline Al-Beyerty | **Cause**: Breach of IT Systems resulting in unauthorised access to data by internal or external sources.<br>Officer/ Member mishandling of information.<br>**Event**: The City Corporation does not adequately prepare, maintain robust (and where appropriate improve) effective IT security systems and procedures.<br>**Effect**: Failure of all or part of the IT Infrastructure, with associated business systems failures.<br>Harm to individuals, a breach of legislation such as the Data Protection Act 2018. Incur a monetary penalty of up to €20M. Compliance enforcement action. Corruption of data. Reputational damage to Corporation as effective body. |  | **12** | All Staff Mandatory Security training has been completed between April to June 2021 - any noncompliance will be reported<br>A special one-off IT Cyber check paid for by LGA has been completed with remediation actions underway.<br>New PSN Health check commissioned to commence, work started on this 28th June, results will be shared and actions to ensure compliance will be followed through once the report is received<br>**11th August 2021** |  | **8** | 30-Sep-2021<br>Reduce | ▬<br>Constant |

| Risk no, title, creation date, owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date/Risk Approach | Current Risk score change indicator |
|---|---|---|---|---|---|---|---|---|
| **CR29 Information Management**<br>08-Apr-2019<br>John Barradell | **Cause:** Lack of officer commitment and investment of the right resources into organisational information management systems and culture.<br>**Event:** The City Corporation's IM Strategy (2018-2023) is not fully and effectively implemented<br>**Effect:**<br>• Not being able to use relevant information to draw insights and intelligence and support good decision-making<br>• Vulnerability to personal data and other information rights breaches and non-compliance with possible ICO fines or other legal action<br>• Waste of resources storing information beyond usefulness |  | **12** | New business intelligence dashboards continue to be developed for improved decision making by the Corporate Strategy and Performance team • An updated An Information Management Asset register has been populated for the organisation.<br>Plan being developed for moving unstructured data from Shared Drives to SharePoint is being developed<br>**11th August 2021** |  | **6** | 31-Dec-2021<br>Reduce | ▬<br>Constant |

Agenda Item 12

| | |
|---|---|
| **Committee(s)** | **Dated:** |
| Digital Services Sub Committee – For Information | 3rd September 2021 |
| **Subject:**<br>IT Division Risk Update | **Public** |
| **Report of:**<br>The Chief Operating Officer | **For Information** |
| **Report author:**<br>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. The IT Division currently holds 4 risks. There are currently no RED risks. There are no extreme impact risks, there are 3 major impact, and 1 Serious and no Minor impact risks.

IT currently holds 2 risks on the Corporate Risk Register and 2 risks on the departmental risk register

### Summary of the Corporate Risks

**CR 16 – Information Security** -

- All Staff Mandatory Security training has been completed between April to June 2021 - any non-compliance will be reported;
- A special one-off IT Cyber check paid for by LGA has been completed with a report due shortly;
- New PSN Health check commissioned to commence, work started on this 28th June, results will be shared and actions to ensure compliance will be followed through once the report is received.

A Gateway Paper is currently under review for further IT Security Investment This is a dynamic risk area and whilst the maturity of 4 is the target, the control scores will go down as well as up as threats, risks and vulnerabilities change.

**CR 29 – Information Management**

- New business intelligence dashboards continue to be developed for improved decision making by the Corporate Strategy and Performance team;
- An updated Information Management Asset register has been populated for the organisation;
- Plans are being developed for moving unstructured data from Shared Drives to SharePoint is being developed

## 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 of Departmental Risks

2. The IT Division currently holds 2 risks, which are not scored as Red.   All risks have owners, clear actions, with target dates to enable focussed management, tracking and regular and consistent reviews.

3. These risks are as follows:

   - CHB IT 004 Business Continuity
   - CHB IT 031 IT Revenue Budget

   Note: details can be reviewed in the appendix.

### Current status

4. Since the last report, the IT Risk Register has been closely monitored and actions have been completed to continue the work to mitigate the risks, however, there has been no movement of scores in this period.

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

Risk Heatmap - July 21

| | | | | |
|---|---|---|---|---|
| Likelihood | 🟩 | 🟨 1 | 🟥 | 🟥 |
| | 🟩 | 🟨 | 🟨 | 🟥 |
| | 🟩 | 🟩 | 🟨 1 | 🟥 |
| | 🟩 | 🟩 | 🟩 | 🟨 |

Risk Heatmap - Current

| | | | | |
|---|---|---|---|---|
| Likelihood | 🟩 | 🟨 1 | 🟥 | 🟥 |
| | 🟩 | 🟨 | 🟨 | 🟥 |
| | 🟩 | 🟩 | 🟨 1 | 🟥 |
| | 🟩 | 🟩 | 🟩 | 🟨 |

|  |  |  |
|---|---|---|
| Impact |  | Impact |

**Movement of Risks**

There has been no movement in the IT risks since the last report

## 5. Further breakdown of current Division risks:

| **Major Impact:** |  |  | **Trend** |
|---|---|---|---|
| Risks with “likely” likelihood and “major” impact: | 0 | 0 | ⇔ |
| Risks with “possible” likelihood and “major” impact: | 0 | 0 | ⇔ |
| Risks with “Unlikely” likelihood and “major” impact: | 1 | 1 | ⇔ |
| **Serious Impact:** |  |  |  |
| Risks with “likely” likelihood and “serious” impact: | 1 | 1 | ⇔ |
| Risks with “possible” likelihood and “serious” impact: | 0 | 0 | ⇔ |
| Risks with “unlikely” likelihood and “serious” impact: | 0 | 0 | ⇔ |

|  |  |
|---|---|
| ⇧ | Increase in No. |
| ⇩ | Decrease in No. |
| ⇔ | Static No. |

## 6. Next steps

- Ensuring that IT deal with Risks in a dynamic manner.

- 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.

- 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.

- The work detailed above ensures that the Risk register remains a live system, rather than a periodically updated record.

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IT Business Manager
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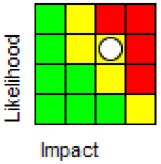
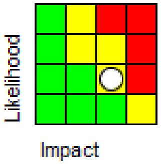
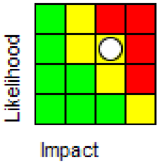
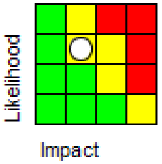
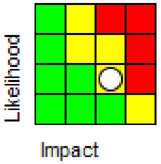
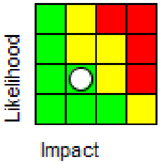
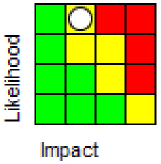
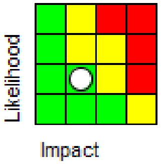
# APPENDIX A - CHB IT All CORPORATE & DEPARTMENTAL risks

| Risk no, title, creation date, owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date/Risk Approach | Current Risk score change indicator |
|---|---|---|---|---|---|---|---|---|
| **CR16 Information Security (formerly CHB IT 030)** | **Cause**: Breach of IT Systems resulting in unauthorised access to data by internal or external sources.<br>Officer/ Member mishandling of information.<br>**Event**: The City Corporation does not adequately prepare, maintain robust (and where appropriate improve) effective IT security systems and procedures.<br>**Effect**: Failure of all or part of the IT Infrastructure, with associated business systems failures.<br>Harm to individuals, a breach of legislation such as the Data Protection Act 2018. Incur a monetary penalty of up to €20M. Compliance enforcement action. Corruption of data. Reputational damage to Corporation as effective body. |  | **12** | All Staff Mandatory Security training has been completed between April to July2021 - any non-compliance will be reported<br><br>New PSN Health check commissioned to commence, work started on this 28th June, results will be shared and actions to ensure compliance will be followed through once the report is received<br><br>We are benchmarking our IT security against new standards and guidance from the NCSC. This will require new IT security investment and policies to be implemented to mitigate this risk |  | **8** | 31-Mar-2022 | ▬ |
| 10-May-2019<br>Caroline Al-Beyerty | | | | **12 Aug 2021** | | | Reduce | Constant |

| Risk no, title, creation date, owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date/Risk Approach | Current Risk score change indicator |
|---|---|---|---|---|---|---|---|---|
| **CR29 Information Management**<br>08-Apr-2019<br>John Barradell | **Cause:** Lack of officer commitment and investment of the right resources into organisational information management systems and culture.<br>**Event:** The City Corporation's IM Strategy (2018-2023) is not fully and effectively implemented<br>**Effect:**<br>• Not being able to use relevant information to draw insights and intelligence and support good decision-making<br>• Vulnerability to personal data and other information rights breaches and non-compliance with possible ICO fines or other legal action<br>• Waste of resources storing information beyond usefulness |  | **12** | New business intelligence dashboards continue to be developed for improved decision making by the Corporate Strategy and Performance team • An updated An Information Management Asset register has been populated for the organisation.<br>Plan being developed for moving unstructured data from Shared Drives to Sharepoint is being developed<br>**12 Aug 2021** |  | **6** | 31-Dec-2021<br>Reduce | ▬<br>Constant |

| Risk no, title, creation date, owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date/Risk Approach | Current Risk score change indicator |
|---|---|---|---|---|---|---|---|---|
| **CHB IT 004 Business Continuity**<br>30-Mar-2017<br>Sean Green | **Cause:** A lack of robust infrastructure and restore procedures are not in place on aging infrastructure. Secondly, there is a lack of resilient or reliable Power services or Uninterruptable Power Supply (UPS) provision in multiple Comms rooms and datacentres in COL and COLP buildings.<br>**Event:** The IT Division cannot provide assurance of availability or timely restoration of core business services in the event of a DR incident or system failure.<br>There will be intermittent power outages of varying durations affecting these areas/buildings. |  | **8** | All services have now been migrated into Azure. Agilisys BC/DR plan has now been provided and is being reviewed internally and will form the basis of the COL IT BCDR Plan. The GW5 has been sent for approval, the project is poised to start immediately.<br>**12 Aug 2021** |  | **4** | 31-Oct-2021 | ▬<br>Constant |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | **Effect:** The disaster recovery response of the IT Division is unlikely to meet the needs of COL leading to significant business interruption and serious operational difficulties.<br>• Essential/critical Systems or information services are unavailable for an unacceptable amount of time<br>• Recovery of failed services takes longer than planned<br>• Adverse user/member comments/feedback<br>• Adverse impact on the reputation of the IT division/Chamberlain's Department | | | | | | | |

| Risk no, title, creation date, owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date/Risk Approach | Current Risk score change indicator |
|---|---|---|---|---|---|---|---|---|
| **CHB IT 031 IT Revenue Budget**<br>10-May-2021<br>Sean Green | **Cause:** The IT Service is subject to a budget reduction of £1.2m in 21/22 or 12% having had this agreed in early March 2021.<br>**Event:** The planned action programme does not deliver the required level of savings within the timeframe set by the City Corporation/Finance Committees<br>**Effect:** The IT budget will be overspent in 2021/22 The services provided by IT to the organisation will need to be descoped to save costs and this may have a downstream impact for the organisation to deliver successful outcomes in front line services. |  | **8** | A plan has been developed and a governance process is in place enabling tracking and corrective action to be taken. A review of the plan is required to be actioned every 2 weeks.<br>**12 Aug 2021** |  | **4** | 31-Dec-2021 | ▬<br>Constant |

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| **Committee(s)** | **Dated:** |
|---|---|
| Digital Services Sub-Committee – For Information | **3rd September 2021** |
| **Subject:**<br>IT Division – IT Service Delivery Summary | **Public** |
| **Report of:**<br>The Chief Operating Officer | **For Information** |
| **Report author:**<br>Eugene O'Driscoll, Client Director<br>Matt Gosden – Deputy IT Director | |

## Summary

There was a total of 3 P1 and 5 P2 incidents for the City of London Corporation and City of London Police in June. All of the incidents were caused by external factors such as supplier works outside of the direct control of Agilisys.

Problem records have been created where appropriate to identify root causes and to manage improvements.

- There were 2 x P1 incidents for City of London Corporation and 1 for City of London Police.

- There were 2 x P2 incidents for the City of London Corporation and 3 for City of London Police.

- **94%** of users reported a satisfactory or very satisfactory experience of the City of London Service Desk and **92.31%** of users reported the same for the City of London Police Service Desk.

## Recommendations

*Members are asked to note this report*

## Main Report

### Service levels and exceptions

1. **City of London Police (CoLP) P1 incidents**

   There was 1 P1 incident

| Affected Service | Duration | Reason | Resolution | Problem Management plan |
|---|---|---|---|---|
| Internet | 02:00 | Fortinet firewall spiked in memory usage to 86%. | ROC restarted New St firewall | Problem Management |

2. **City of London Police P2 Incidents**

   There were 3 P2 incidents

| Affected Service | Duration | Reason | Resolution | Problem Management plan |
|---|---|---|---|---|
| BoBo/HR | 02:43 | Root cause to be confirmed | Resolved by Capita | Supplier Management |
| Emails from PNN | 05:42 | Root cause to be confirmed | Resolved by restarting MailMarshal | Problem Management |
| Printing | 09:28 | Terminal server cluster issue | Resolved by Konica | Problem Management |

## 3. City of London (CoL) P1 incidents

There were two P1 incidents

| Affected Service | Duration | Reason | Resolution | Problem Management plan |
|---|---|---|---|---|
| Internet access | 01:07 | Root cause to be confirmed | Barracuda device was restarted | Supplier Management |
| Network and telephony | 23:50 | An underground electricity cable faulted on high voltage network, causing an area wide power cut. | Power was restored and services brought back up | Supplier Management |

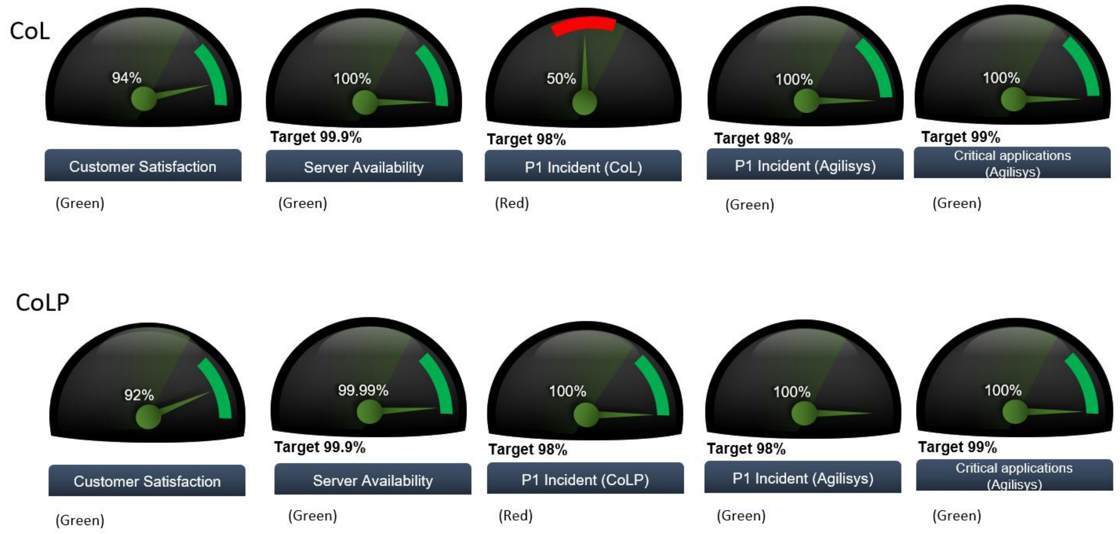
## 4. City of London P2 Incidents

There were no P2 incidents

| Affected Service | Duration | Reason | Resolution | Problem Management plan |
|---|---|---|---|---|
| Registrars' website | 30:58 | CoL change | Change was reversed | Change Management |
| City People | 00:44 | Application services stopped unexpectedly | Services were restarted on the server | Problem Management |

**Service performance summary is detailed in the dashboard below**:

**Gauges to monitor performance – June 2021**



**Service improvements and highlights**

- Improvements were made to the Digital Services (self-service) Portal. The IT team will be championing its use within the business in September.
- Processes for Starters, Movers and Leavers under review in both City of London Police and City of London Corporation to improve performance
- The PSN Healthcheck has been completed the IT team are working through the plan to remediate the issues identified.

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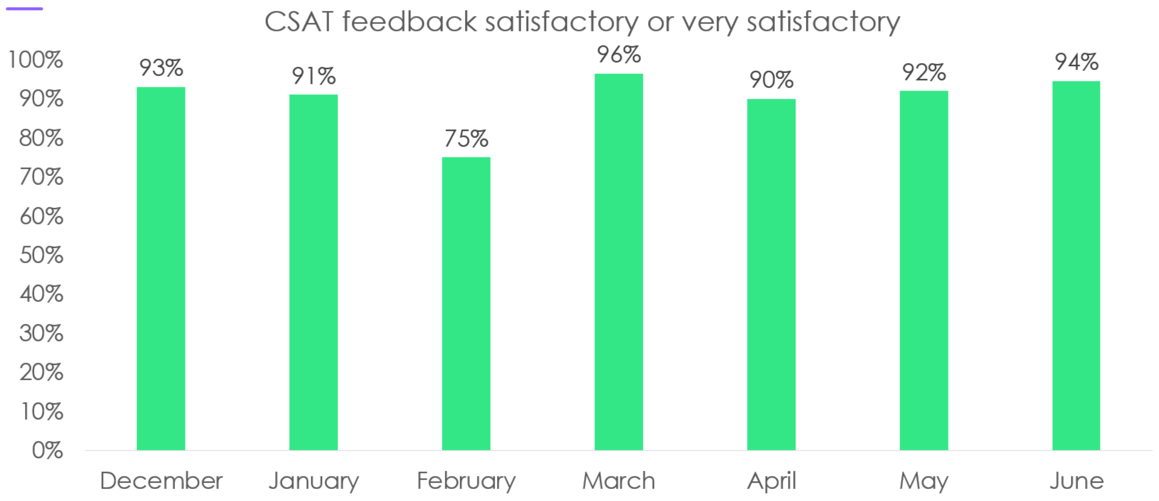
**Appendences**

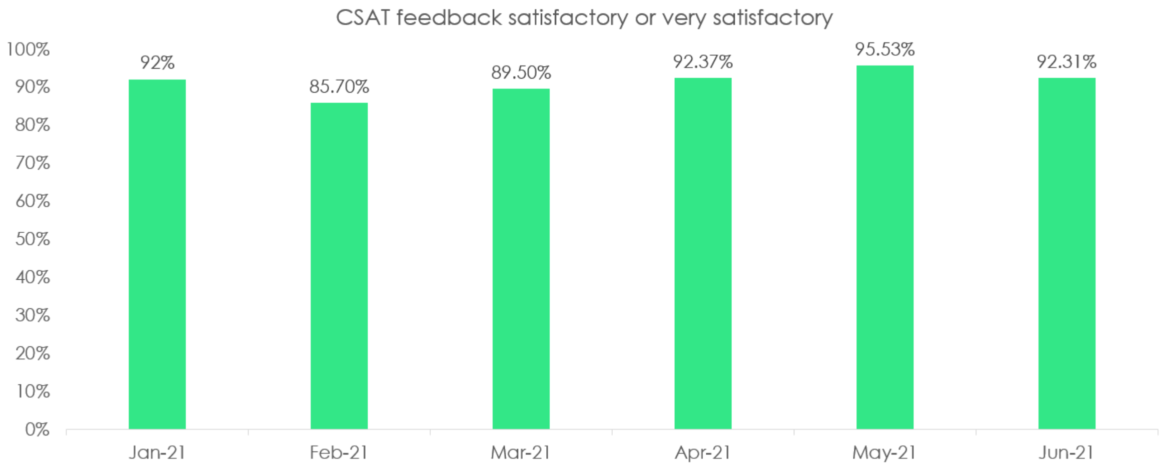
Appendix 1 – Trend Graphs

# Appendix 1 – Trend Graphs

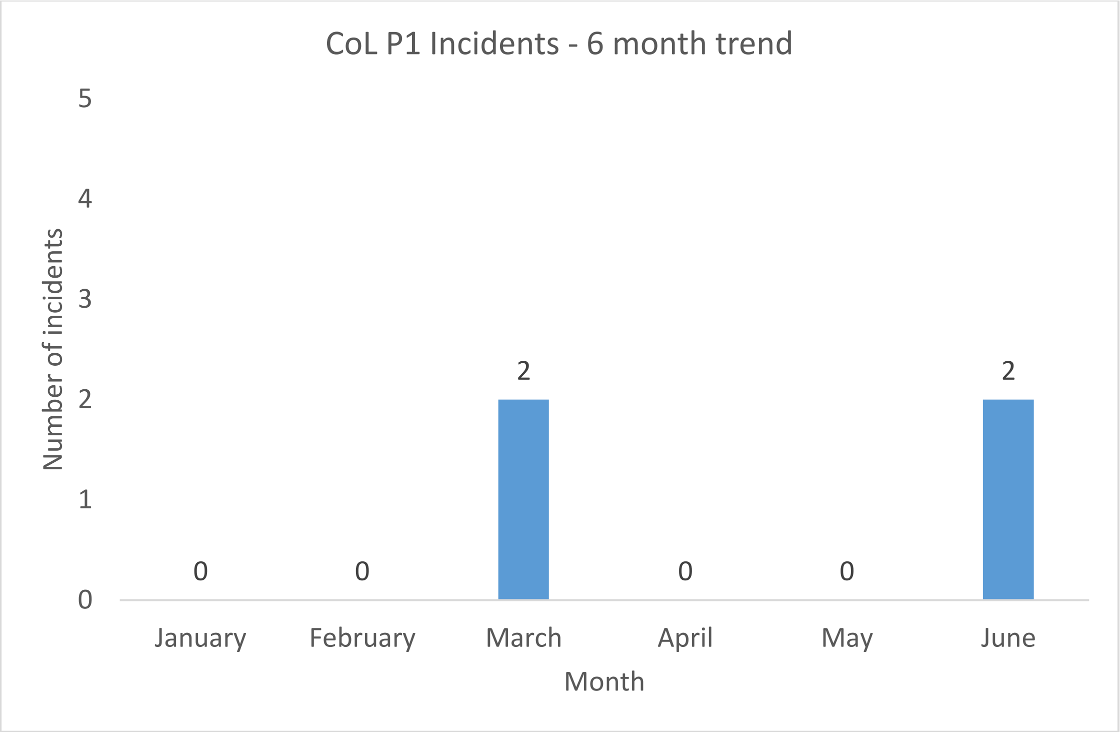
## CoL Customer Satisfaction

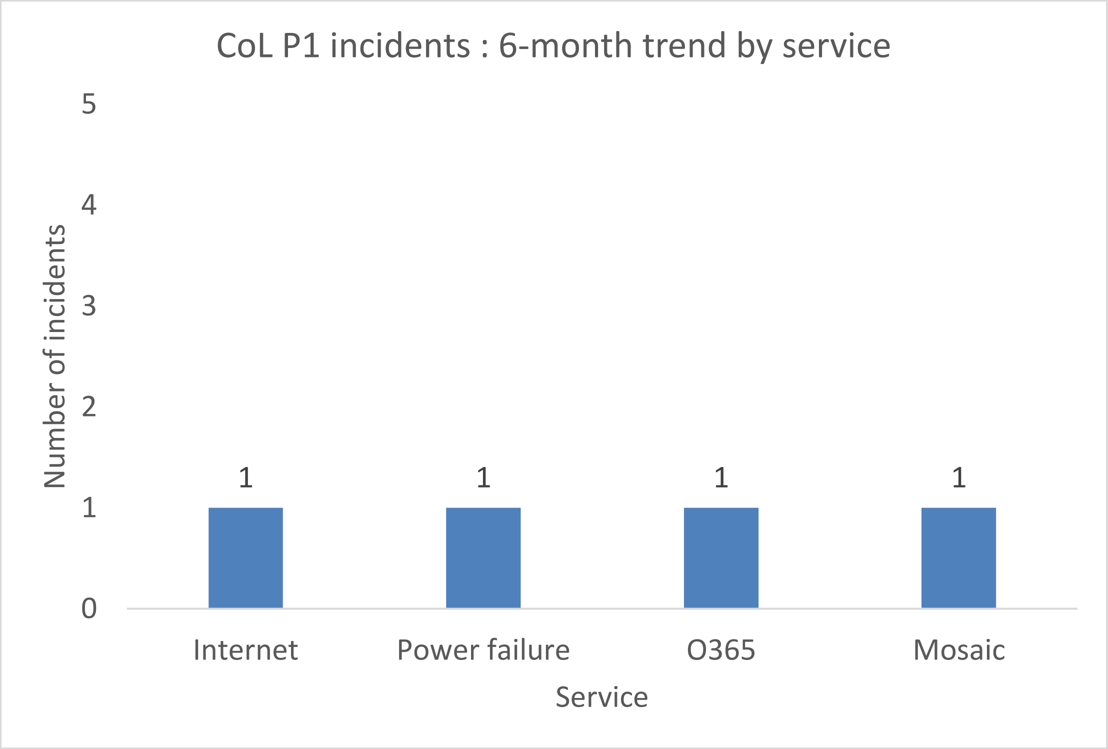


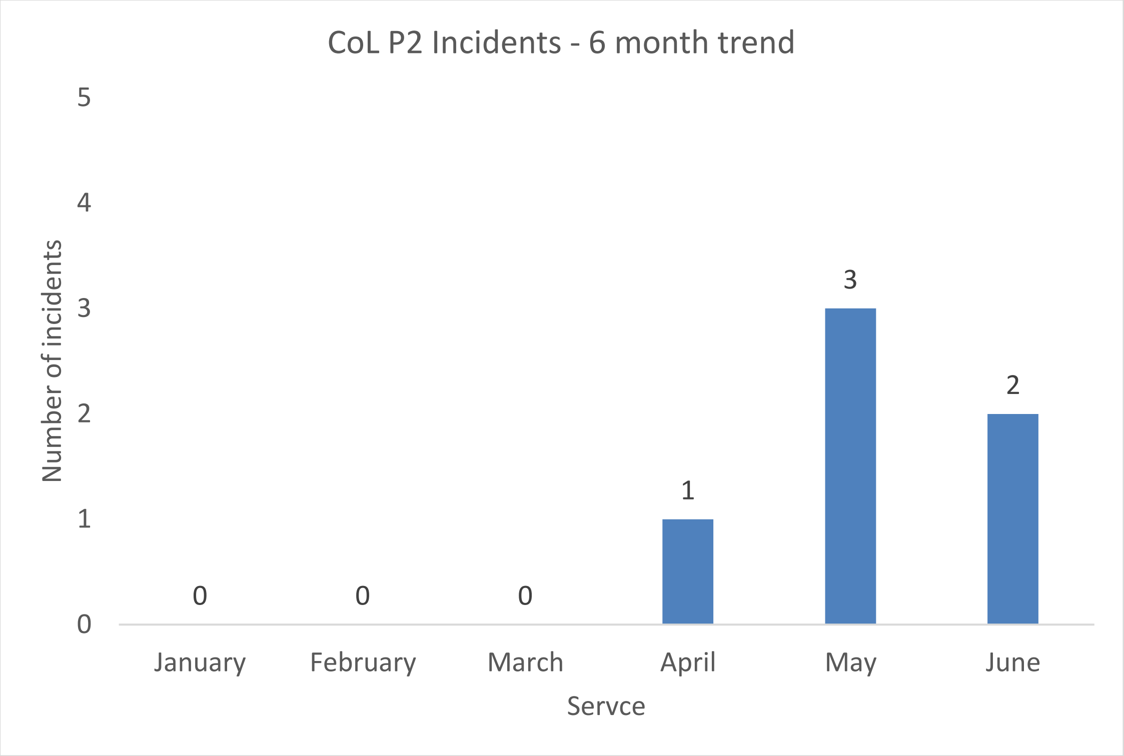
## CoLP Customer Satisfaction

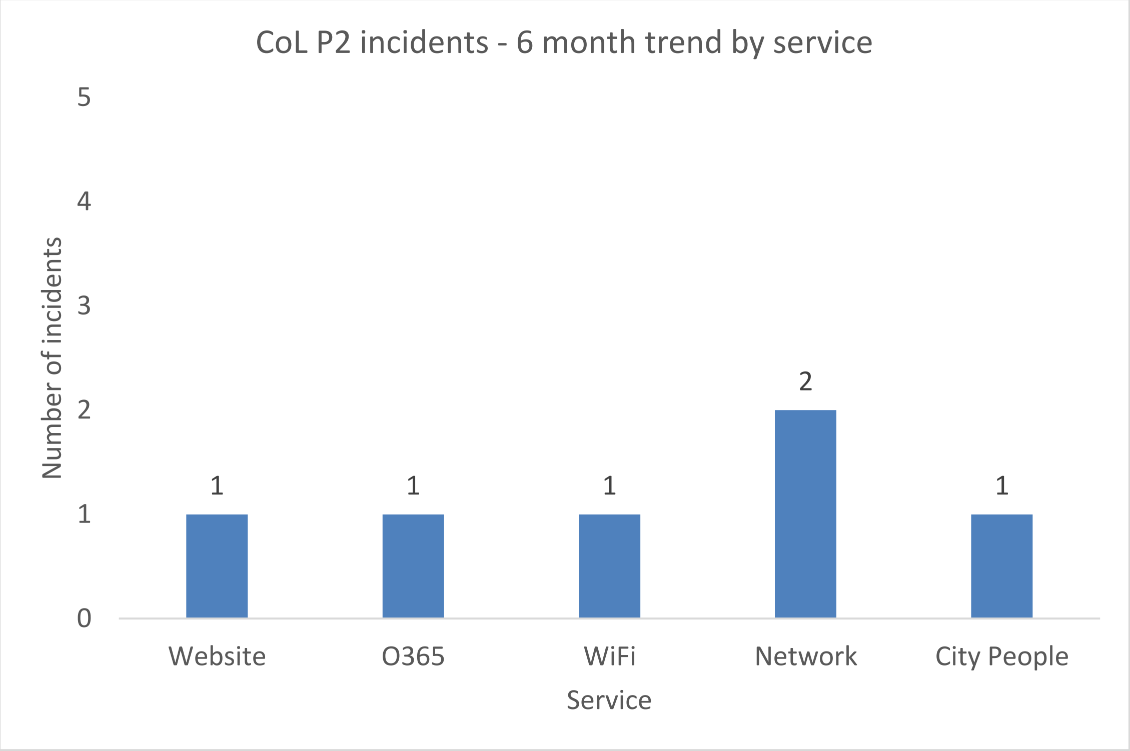


## CoL Priority Incident trending – 6-month view

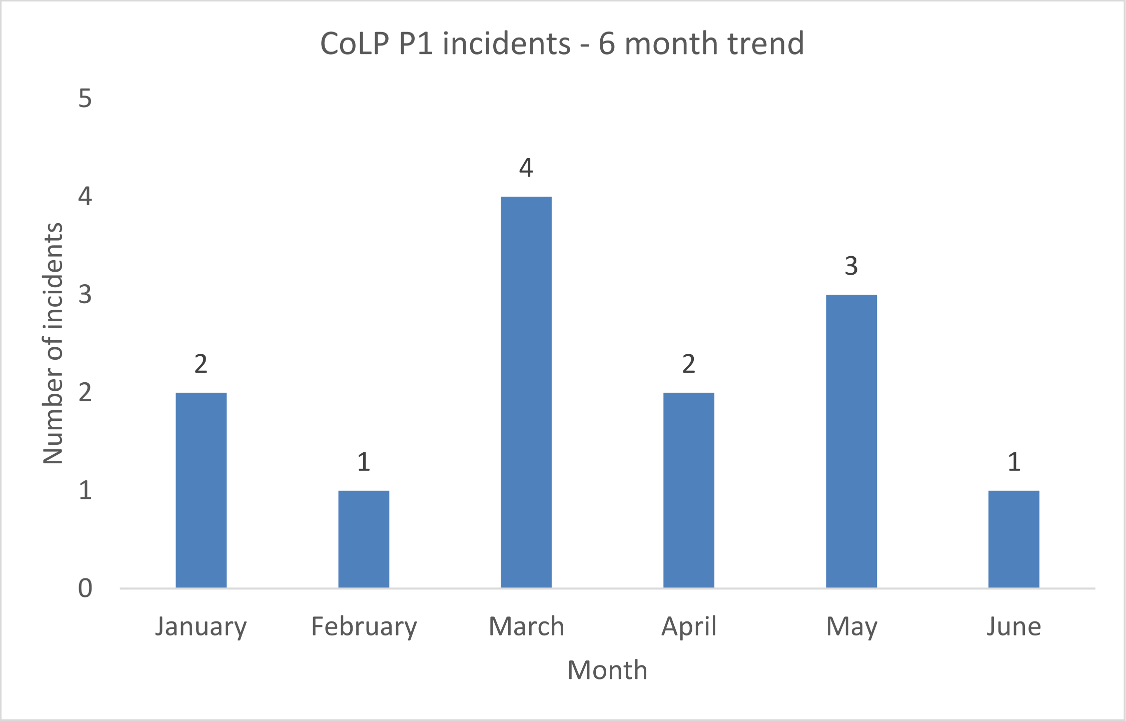

CoL P1 Incidents - 6 month trend
Number of incidents
5
4
3
2
1
0
0
0
2
0
0
2
January
February
March
April
May
June
Month

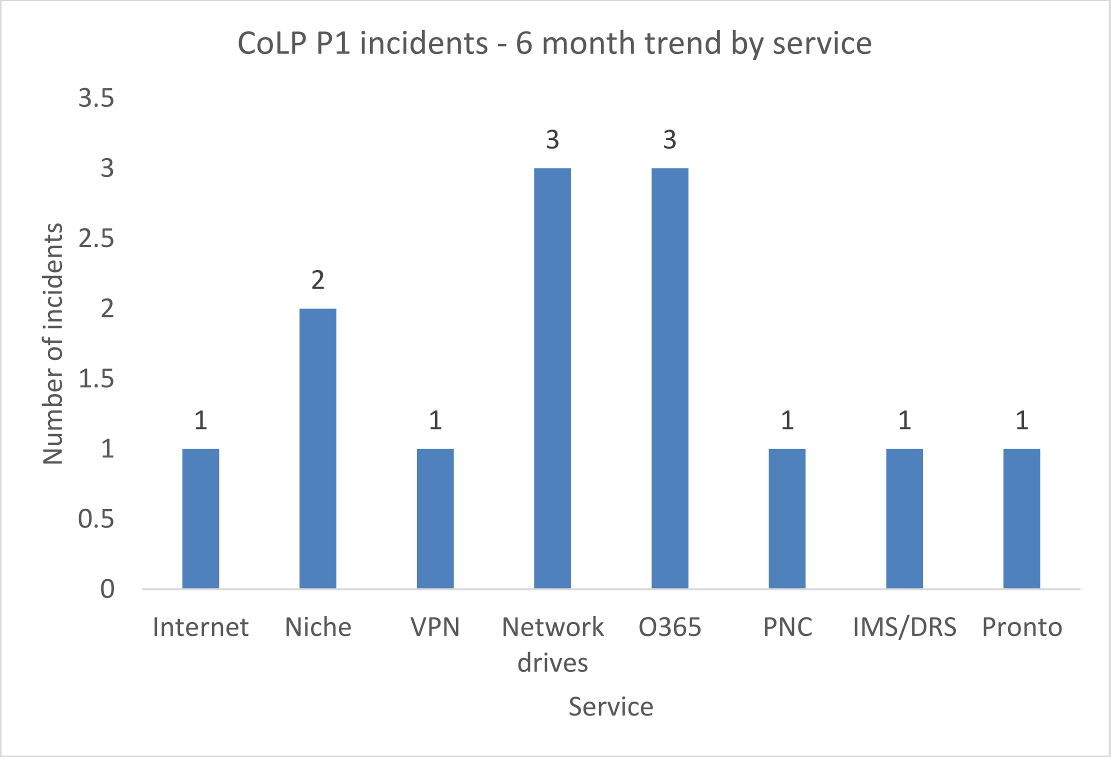

CoL P1 incidents : 6-month trend by service
Number of incidents
5
4
3
2
1
0
1
1
1
1
Internet
Power failure
O365
Mosaic
Service

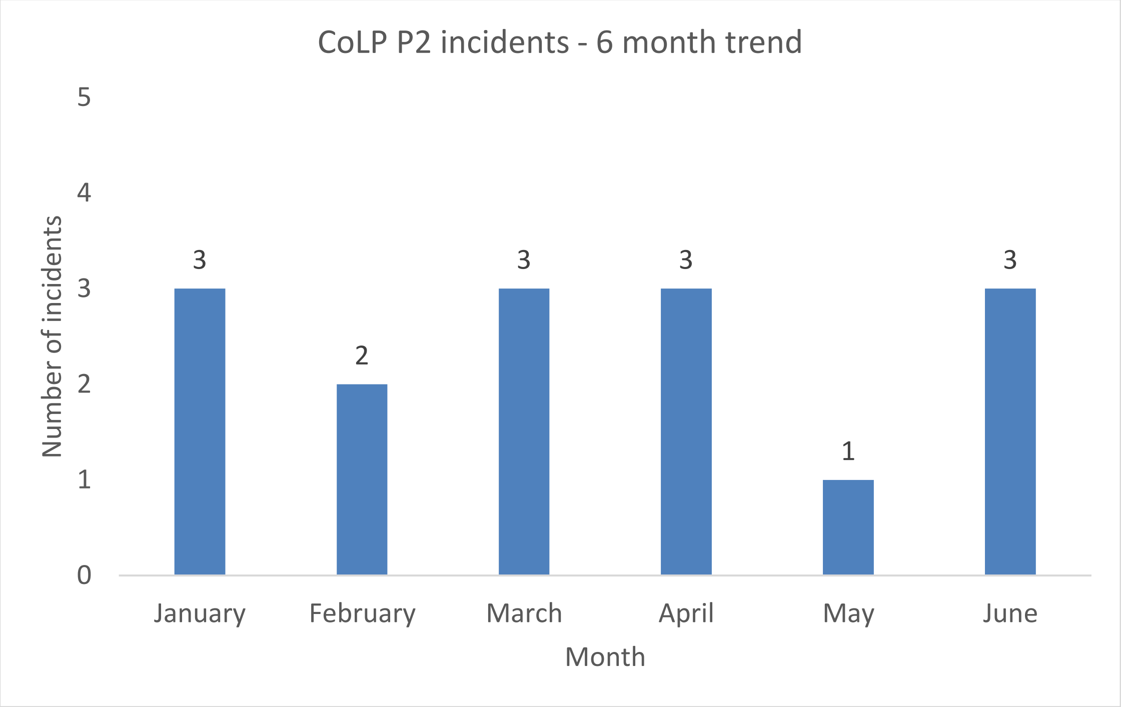

CoL P2 Incidents - 6 month trend
Number of incidents
5
4
3
2
1
0
0
0
0
1
3
2
January
February
March
April
May
June
Servce

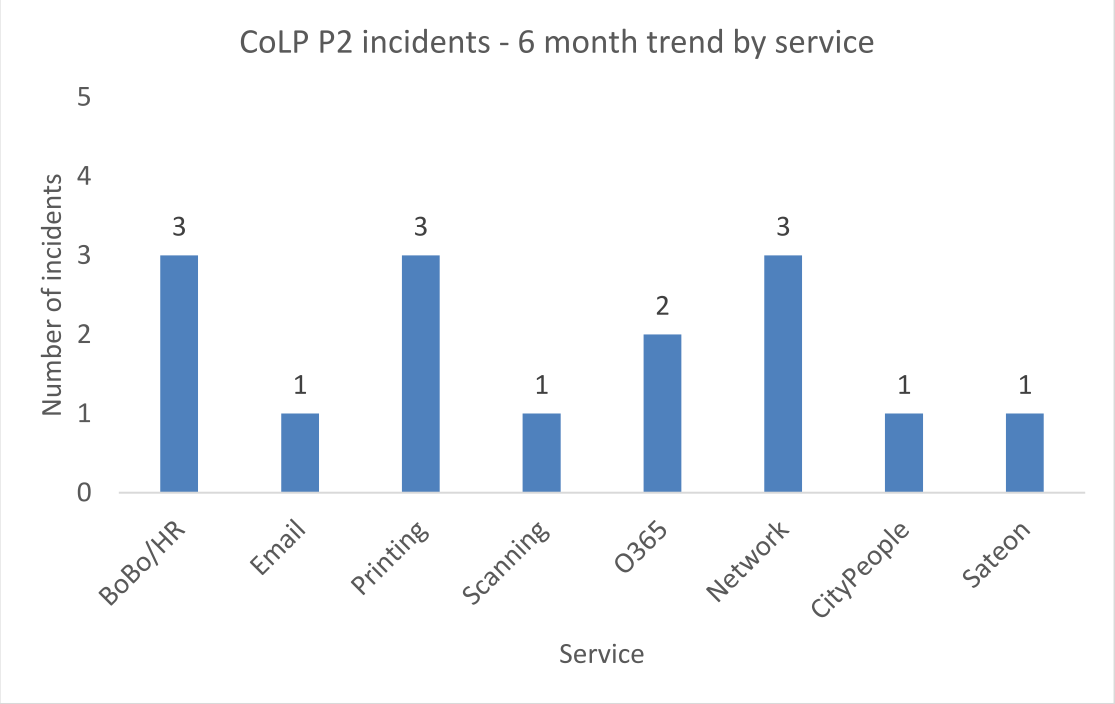

CoL P2 incidents - 6 month trend by service
Number of incidents
5
4
3
2
1
0
1
1
1
2
1
Website
O365
WiFi
Network
City People
Service

## CoLP Priority Incident trending – 6-month view






CoLP P2 incidents - 6 month trend
Number of incidents
5
4
3
2
1
0
3
2
3
3
1
3
January
February
March
April
May
June
Month


CoLP P2 incidents - 6 month trend by service
Number of incidents
5
4
3
2
1
0
3
1
3
1
2
3
1
1
BoBo/HR
Email
Printing
Scanning
O365
Network
CityPeople
Sateon
Service

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# Agenda Item 17

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