

MERSEYTRAVEL



Information Management Group

Annual Report 2017/18

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1. The Role of the Information Management Group

The Information Management Group (IMG) was established in July 2015 as a sub-group of the Primary Assurance & Risk Group (PARG) to ensure that Merseytravel's legal obligations in respect of Data Protection and Freedom of Information are met and that risks associated with information governance are appropriately managed.

IMG's Terms of Reference were last reviewed and approved by Merseytravel (the Executive) in January 2017 and define the responsibilities of the group follows :-

- The implementation or the monitoring of the implementation of any recommendations made in Internal or External Audit Reports relating to matters of Information Governance;
- Development and maintenance of an Information Management Policy Framework which is underpinned by a cohesive suite of policies and procedures in relation to information management, security and governance across Merseytravel;
- Development and maintenance of an Information Risk Register;
- Providing a forum for the sharing of best practice and discussing and resolving operational issues brought by group members / officers;
- Development and maintenance of an Information Management information page on the corporate intranet (OnePlace);
- Development and delivery of Information Management training and raising awareness through, for example, e-bulletins, e-learning, induction and refresher training;
- Updating and reporting activity / concerns and emerging risks to the Primary Assurance & Risk Group / SIRO / Merseytravel (the Executive) and the Audit, Risk & Governance Board when required / appropriate;
- Establishment and maintenance of the Merseytravel Publication Scheme;
- Development and maintenance of a Merseytravel Retention Schedule for the retention and destruction of data, in accordance with Local Government Classification Scheme (LGCS) guidance;
- Maintaining up-to-date knowledge of legislative requirements in respect of information security, cyber-security, etc and responding to the effects of new Government initiatives and new legislation/regulations as appropriate;
- Liaison with the SIRO / DPO and the Information Commissioner in respect of correspondence, complaints and / or data breaches;
- Monitor FOI / EIR / subject access / CCTV requests and compliance with legislative requirements in response to such requests; and
- Develop and implement a formal process in respect of third party access and information sharing to ensure that all partners, contractors and suppliers comply with the Merseytravel security policies.

IMG aligns its meetings to precede the bi-monthly meetings of PARG and meets every eight weeks. Meetings are chaired by the Senior Information Risk Owner (SIRO) and in the absence of the SIRO, the Deputy SIRO chairs the meeting.

IMG provide an update report on activity to PARG as a standard agenda item and additional reporting on specific issues as / if requested by PARG, the SIRO, the Audit, Risk & Governance Board, individual Directors or the Executive (Merseytravel). PARG will provide regular updates to the Executive (Merseytravel).

This Annual Report will be presented to both Merseytravel and the Merseytravel Audit, Risk & Governance Board.

2. IMG Membership 2017/18

- The Director of Resources (SIRO)
- The Head of Internal Audit (Deputy SIRO)
- The Head of IT
- The Head of Legal, Democratic Services & Procurement
- The Senior Information Management Officer
- The Head of People & Customer Development
- The Head of Policy & LTP Development
- Corporate Communications Manager
- Police Operations Manager
- IT Governance Officer
- The Head of Customer Delivery

3. Summary of work undertaken in 2017/18

A summary of the activities of IMG during the year are detailed in Table 1 below:

TABLE 1

MEETING DATE	DETAILS OF BUSINESS	ATTENDEES
24 May 2017	<ul style="list-style-type: none"> - Information Management Policy Framework - FOI Disclosure Log - Data Intelligence Project Update Report - GDPR Sub-Group - Information Breach – Concessionary Travel Application - Information Risk Register - Internal Audit Reports – Summary Report - Quarter 4 FOI Report (2016/17) 	Stephanie Donaldson Gary Evans Louise Outram Alastair Ramsay Ian Hawkins Andrew Henderson Sue Twidale Colin Moneyppenny Katriona Lloyd

	<ul style="list-style-type: none"> - Issues Bulletin 	
17 July 2017	<ul style="list-style-type: none"> - Information Management Policy Framework – Information Security Incident Protocol: Update - Data Intelligence Project – Update - Rail Data Feasibility Study- Update - GDPR Sub-Group- Update - PCI Sub-Group Update - Information Asset Register - Information Risk Register - Internal Audit Reports – Summary Report Q1 2017/18 - Quarter 1 FOI Report (2017/18) - Issues Bulletin - Information Governance Internal Audit (SIAS) Follow-Up review update 	<p>Stephanie Donaldson Liz Storey Carole Carroll Alastair Ramsay Ian Hawkins Andrew Henderson Sue Twidale Liam Phelan Stephen Littler Paul Johnson</p>
22 September 2017	<ul style="list-style-type: none"> - Information Management Policy Framework Information Security Incident Protocol: Update Publication Scheme - Data Intelligence Project – Update - GDPR Sub-Group- Update - PCI Sub-Group Update - IT service notifications - Information Risk Register - Internal Audit Reports – Summary Report Q2 2017/18 - Information Governance Internal Audit (SIAS) Follow-Up Report - Off-site Storage – Audit Report - Issues Bulletin 	<p>Stephanie Donaldson Andrew Henderson Louise Outram Carole Carroll Alastair Ramsay Gary Evans Liz Storey Ian Hawkins Sue Twidale</p>
22 November 2017	<ul style="list-style-type: none"> - Information Management Policy Framework - Information Security Incident Protocol - Data Intelligence Project - GDPR Sub-Group- Update & 	<p>Stephanie Donaldson Gary Evans Ian Hawkins Andrew Henderson Louise Outram Jo Sawyer (<i>in place of</i>)</p>

	<ul style="list-style-type: none"> - Action Plan - PCI Sub-Group Update - Off-Site Storage Sub-Group TORs and Action Plan - IT Service Notifications – Update - Information Risk Register - FOI Quarterly Stats Report (Q2) - Issues Bulletin 	<p><i>Liz Storey from this point onwards)</i> Anthony Tierney Sue Twidale Katriona Lloyd Paul Collins</p>
17 January 2018	<ul style="list-style-type: none"> - Information Management Policy Framework - Data Intelligence Project Update - GDPR Sub-Group- Update: Update / ICO self-assessment outcome & Action Plan - Data Protection Impact Assessment – Draft - Fair Processing Notice template – Draft - PCI Sub-Group Update - Off-Site Storage Sub-Group Update - Updated Action Plan - Briefing Note: Next Steps Template / Guidance for storage requests - IT Service Notifications – Update - Information Risk Register - FOI Quarterly Stats Report (Q3) - Audit Reports – Information Management Issues arising (Q3) - Issues Bulletin 	Stephanie Donaldson Carole Carroll Ian Hawkins Andrew Henderson Louise Outram Alistair Ramsey Jo Sawyer Anthony Tierney Sue Twidale Colin Moneyppenny
14 March 2018	<ul style="list-style-type: none"> - Information Management Policy Framework - Request from ARG Board – Information Governance Policy development - GDPR Sub-Group- Update & Action Plan - PCI Sub-Group Update - Off-Site Storage Sub-Group Update - IMG Terms of Reference & 	Stephanie Donaldson Gary Evans Ian Hawkins Louise Outram Alastair Ramsay Joanna Sawyer Sue Twidale Liam Phelan

	Membership 2018/19 - IMG Annual Report 2017/18 (for agreement) - 11KBW Law Conference – Feedback - IT Service Notifications – Update - Information Risk Register - Issues Bulletin	
	-	Stephanie Donaldson Gary Evans Liam Phelan Andy Henderson Louise Outram Alastair Ramsay Sue Twidale Paul Hart

During the year, the Group established or maintained overview of three sub-groups as follows:

- PCI Sub-Group;
- GDPR Sub-Group; and
- Off-Site Storage Sub-Group.

Sub-group terms of reference are attached at Appendix 1. IMG also maintain an oversight and support role to the Data Intelligence and Review project, led by the Policy and Performance team, which was previously a workstream of the Support Services Transformation Project (SSTP).

4. Key Achievements of IMG in 2017/18

- Facilitating data protection training across the business, delivered by the Senior Information Management Officer;
- Development and maintenance of a comprehensive information management policy framework;
- Leading on General Data Protection Regulations (GDPR) readiness;
- Undertaking a significant piece of work in relation to the off-site storage facility and the volume and cost of the documentation held therein and associated GDPR and data protection implications.
- Establishing a Disclosure Log of responses to Freedom of Information requests on Merseytravel’s website

5. Looking Forwards

The key focus of the IMG during 2018/19 will be to build upon the work completed during 2017/18 to embed and maintain effective information risk management arrangements and appropriate overview of legislative compliance.

Future considerations and challenges for 2018/19 include:

- Ensuring GDPR compliance can be demonstrated in the lead up to the implementation date of 25 May 2018;
- Reducing the costs and risks associated with the off-site storage facility;
- Ensuring Level 1 PCI compliance following the roll-out of contactless payments at the Mersey Tunnels;
- To appraise PARG, Merseytravel and the Audit, Risk & Governance Board in respect of information governance, risk management and assurance.

APPENDIX 1

INFORMATION MANAGEMENT GROUP

1. GDPR Sub Group

MEMBERSHIP & TERMS OF REFERENCE

Members:

Stephanie Donaldson – Head of Internal Audit / Deputy SIRO
Louise Outram – Head of Legal, Democratic Services & Procurement
Andy Henderson – Senior Information Management Officer
Ian Hawkins – IT Service Delivery Manager
Janet Roach – Customer Delivery Manager

Purpose:

1. To review GDPR requirements
2. To consider any relevant guidance and address issues thereunder.
3. To consider how GDPR impacts on Merseytravel and its services
4. To engage with relevant officers to effect introduction of GDPR compliant practices and procedures.
5. To give guidance in respect of / amend any processes / procedures as required.
6. To keep the purpose and composition of the Group under review.
7. To revert to IMG in respect of GDPR and readiness for compliance.

2. Off-Site Storage Sub Group

TERMS OF REFERENCE

Members:

Stephanie Donaldson – Head of Internal Audit (Chair)
Paul Collins – Principal Auditor (Technical)
Louise Outram – Head of Legal, Democratic Services & Procurement
Andy Henderson – Senior Information Management Officer
Al Ramsay – Head of People & Customer Development
Steve Carlile - Service Controller & Supervisor

Purpose:

1. To review the findings of the Internal Audit Report: Off-site Storage (October 2017)
2. To provide a response to the recommendations contained therein as follows:
 - Suggested action
 - Responsible Officer

- Implementation Date
3. To co-ordinate and facilitate implementation of the recommendations outlined in the above Report.
 4. To provide regular updates to the Information Management Group in respect of:
 - Actions ongoing and completed
 - Information Management Risks arising and / or addressed
 - Any other emerging / key issues or concerns
 5. To keep the TOR's / purpose of this Sub Group under review

3 .PCI Sub Group

MEMBERSHIP & TERMS OF REFERENCE

Members:

Ian Hawkins – IT Service Delivery Manager
Rachel Hellier – IT Solutions Architect
Gary Evans – Head of Customer Delivery
Sarah Johnston – Head of Finance
Paul Collins – Principal Auditor (Technical)
Andy Henderson – Senior Information Management Officer

Purpose:

To facilitate the PCI Self-Assessment Questionnaire process and ensure compliance with the Payment Card Industry Data Security Standard (PCIDSS)

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