

Meeting of:	Cabinet
Date of Meeting:	Thursday, 06 June 2024
Relevant Scrutiny Committee:	Corporate Performance and Resources
Report Title:	Vale of Glamorgan Information Governance Strategy
Purpose of Report:	To inform Cabinet on the development of the Council’s Information Governance Strategy and seek approval for the Strategy.
Report Owner:	Executive Leader and Cabinet Member for Performance and Resources
Responsible Officer:	Tom Bowring, Director of Corporate Resources
Elected Member and Officer Consultation:	Due to the corporate nature of this report, no ward Member consultation has been undertaken. Consultation has been undertaken with Senior Leadership Team and Information Governance Board. It will also be considered by Insight Board and if approved by Cabinet will be overseen by Insight Board.
Policy Framework:	This is a matter for Executive decision by Cabinet.
<p>Executive Summary:</p> <ul style="list-style-type: none"> • This report provides Cabinet with an overview of the draft Information Governance Strategy and outlines how the strategy will ensure that the Council continues to use information by design rather than by default. • The draft Information Governance Strategy sets out key elements of the Council’s current Information Governance Framework. It also sets out how it intends to develop in the future, to keep pace with the Council’s long term goals. 	

Recommendations

1. That Cabinet note the contents of this report and the draft Information Governance Strategy (Appendix A).
2. That, subject to Recommendation 1, Cabinet endorses and approves the draft Information Governance Strategy (Appendix A).

Reasons for Recommendations

1. To enable Cabinet to consider the draft Information Governance Strategy.
2. To ensure the Council continues to have a relevant strategic overview of Information Governance to maintain its governance of information by design and not by default.

1. Background

- 1.1 As an organisation, the Council has a diverse collection of information and uses it in many different ways. A significant amount of the information is personal, confidential or commercially sensitive. The Council is the custodian of that information for its citizens, stakeholders and partners. Responsible management of this information is important in order to ensure that it delivers services efficiently and with public confidence. The draft Information Governance Strategy seeks to complement other plans and strategies and ensure positive information management across all service areas.
- 1.2 The Information Commissioners Office (ICO) requires organisations to handle personal information responsibly and to set high standards of accountability. It expects organisations to handle information by design and not default. The draft Information Governance Strategy seeks to ensure the Council continues to meet these requirements by setting strategic actions and working alongside the Council's other plans and strategies.
- 1.3 The way in which the Council delivers services and operates has changed significantly over the last few years. Its office based work force and Elected Members operate far more virtually than ever before. The way information is collected and maintained is evolving. More complex and sophisticated digital solutions are available and continue to become available, such as artificial intelligence. The Council is evolving into a paperless, virtual model. These changes provide opportunities to support all service areas, and ultimately the Council's Medium Term Financial Plan and Corporate Plan. It is important to ensure the maintenance of integrity and security of information. This draft strategy seeks to work alongside the Workforce plan and People Strategy, Medium Term Financial Plan and Strategy, together with the Digital and Data

Strategies to ensure that the Council is able to achieve its goals without compromising the security of the information it holds.

- 1.4** The scope of the draft Information Governance Strategy is broader than both the Digital and Data Strategies, with a focus on information in all forms. There is, however, synergy between these Strategies, with the work of the draft Information Governance Strategy contributing to the delivery of Theme 4, Commitment 2 of the Digital Strategy – to use clear standards to ensure effective data sharing and Key Theme 3 of the Data Strategy – Ensuring Robust Data Governance and Management.

2. Key Issues for Consideration

- 2.1** The draft Information Governance Strategy, attached at Appendix A, seeks to ensure that the Council will continue to approach its use of information by design rather than by default. It seeks to achieve this by focussing on the following key areas:
1. Governance Framework
 2. Awareness and Transparency
 3. Secure & Safe Systems
 4. Robust and Transparent Data Managing and Handling.
- 2.2** These four areas are established within the Council's current infrastructure. The Strategy recognises this and seeks to provide an overview of that infrastructure. It endeavours to look ahead at areas of potential change and development required to keep pace with the Council's strategies and plans over the next four years. In order to do this, it highlights the existing arrangements, sets out aspirations and an action plan.
- 2.3** The first area set out in the draft Strategy is the Governance Framework. This refers to the developed infrastructure, which currently exists to ensure the management of information at a strategic level. This framework in its current form is robust to provide support to the Council's future goals. Its future aspirations encapsulate the recognition that it is important the framework maintains its current status and works together with the Council's other strategies (in particular the Digital and Data Strategy) to test and support future change.
- 2.4** The second area in the Strategy is Awareness and Transparency. The Council's current arrangements are well established. Given the intended evolution of how the Council does business as highlighted in the Digital and Data strategies, it will be important to ensure that this area of Information Governance evolves too. Its

evolution will work in tandem with elements of the Digital and Data Strategy. Policy, guidance and training will need to develop alongside the Digital and Data Strategy.

- 2.5** The third area of the draft Strategy relates to Secure and Safe Systems (with Effective Incident and Breach Response Management). The draft Strategy recognises and highlights that the Council has existing systems in place. However, with the use of more innovative software and other IT solutions the Council recognises it will see further significant change in how it does business and communicates, virtual infrastructure gathering momentum whilst paper based processes reduce. It recognises that the software used is likely to change. The draft Strategy seeks to support those areas of change by being dynamic.
- 2.6** The fourth area of the draft Strategy is Robust and Transparent Data Managing and Handling. The Council has been developing its current structures and support as this area of Information Governance is one of the more challenging areas to maintain and keep abreast of good practice. It is more challenging because of the varied nature and volume of information held by the Council. Currently the Council as with many other organisations is looking to technology in order to use its data more efficiently and effectively. The Council recognises that these changes can only take place where there is responsible data management and handling. The draft Strategy's future aspirations seek to support this.
- 2.7** To assist with the delivery and monitoring of the draft Strategy, an action plan drawn from the aspirations has been prepared. (It sits at the back of the Strategy). Designated officers taking lead responsibility within realistic timeframes. Inevitably the actions will often need to be flexible to the Council's other plans and strategies in order to ensure they remain relevant and useful. The Information Governance Board, reporting to the Strategic Insight Board will have oversight.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1** The draft Information Governance strategy will ensure that the other strategies and plans as outlined in this report are supported from an Information Governance perspective, so that they can meet the Council's Well-being Objectives.
- 3.2** The draft Information Governance Strategy aligns strongly to the Digital and Data Strategies, which in turn align to the Corporate Plan and the Council's Well-being Objectives, providing a strategic focus to the development of data to support staff to provide the best possible service to the Vale of Glamorgan's citizens safely and securely, maintaining integrity and confidence.

- 3.3** The draft Strategy takes into consideration the People Strategy and Workforce Plan.

4. Climate Change and Nature Implications

- 4.1** The draft Digital and Data Strategies are directly linked to work that is being taken forward by the Council's Project Zero programme and the work force plan and the Draft Information Governance Strategy seeks to support that.

5. Resources and Legal Considerations

Financial

- 5.1** There are no specific resource considerations, the majority of action outlined in the plan can be delivered from within existing resources. Some improvements proposed may require additional funding and these would be subject to funding bids that would require approval in accordance with the Council's Budget Strategy.

Employment

- 5.2** There are no employment implications arising as a direct result of this report.

Legal (Including Equalities)

- 5.3** There are no direct legal implications arising from this report.

6. Background Papers

16th November 2023, Cabinet Report, [Digital Strategy Update](#)

20th March 2024, Corporate Performance and Resources Scrutiny, [Digital Strategy Review – Vale of Glamorgan](#)

6th June 2024 – Vale of Glamorgan Council Data Strategy Cabinet Report .

Information Governance Strategy

2024-2028

Introduction

Information Governance plays an important role in how the Council delivers its objectives. Information is a key asset to the Council and fundamental to Elected Members, staff and citizens. Information is important to policy development, efficiency and service delivery. Information held by the Council originates from many sources and is complex. It has a diverse range of sensitivities from personal data to commercially sensitive data. It is important that the organisation understands the nature of the information it holds, uses it wisely and securely and appreciates its importance.

This Strategy sets out how this organisation manages its information whether in paper or electronic format and how it envisages it will develop in the future. It recognises that good information and data management is important in order to provide better services and to ensure its citizens have confidence in how the Council uses information. It knows the importance of a positive information management culture both within and outside the organisation. This Strategy follows the approval of the Council's Digital Strategy and the Data Strategy, which is currently under development, the People Strategy and Workforce strategic plan, Medium Term Financial Plan and ultimately the Corporate Plan. It seeks to support the Council's aspirations and goals with a vision of robust and consistent Information Governance across the Council. This Strategy takes account of the Council's internal review of its Information Governance systems, as endorsed by the SLT in January 2023. The Information Commissioner's Accountability Framework formed the basis of the review. This Strategy aspires to improve existing systems by improving existing processes to enhance a positive culture of Information Governance.

Scope of Strategy

This strategy covers key areas of Information Governance as determined by this Council:-

1. Governance Framework. 2. Awareness and Transparency 3. Secure and Safe Systems (with Effective Incident and Breach Response Management) 4. Robust and Transparent Data Managing and Handling

It embraces the core values of the Council:-

- Ambitious - Forward thinking, embracing new ways of working and investing in our future.
- Open - To different ideas and being accountable for the decisions we take

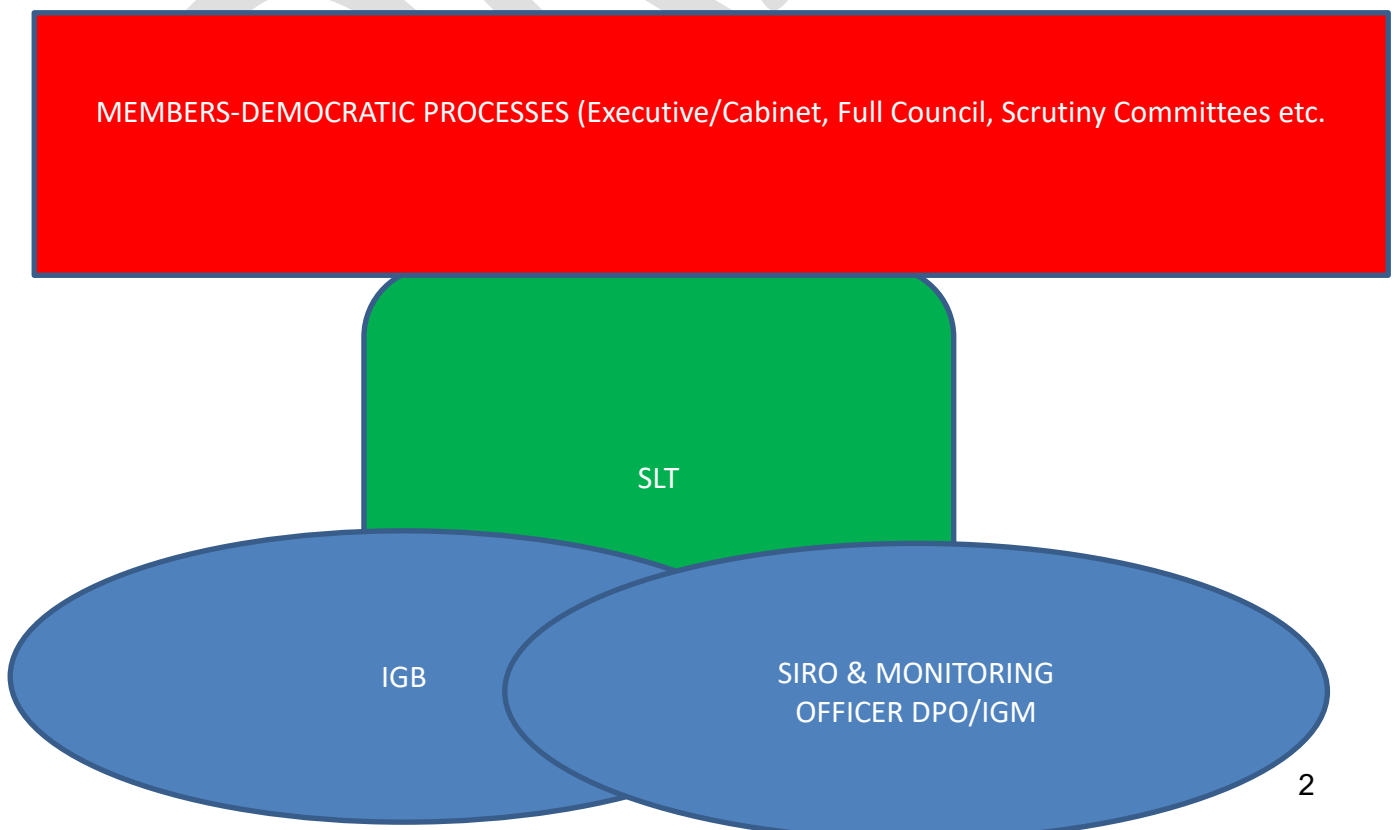
- Together - Working together as a team that engages with our customers and partners respects diversity and is committed to quality services.
- Proud - Proud of the Vale of Glamorgan: proud to serve our communities and to be part of the Vale of Glamorgan Council.

The Strategy has been developed and will be implemented by embracing the Five Ways of Working contained in the Wellbeing of Future Generations Act. The Strategy seeks to ensure preventative actions are put in place to safeguard the citizen and Council from undue harm. The Strategy is conscious of the environment within which the Council operates, and the implications of our actions on other organisations in an integrated way. The Strategy has been developed through a process of involvement and collaboration with a wide range of colleagues, and its implementation is reliant on an ongoing process of active involvement and collaboration. The Strategy sets out a series of ambitions which are translated into actions, to demonstrate the Council's long-term aspirations for strong information governance.

1. Governance Framework

Data Protection legislation requires an organisation to be able to demonstrate it has appropriate technical and organisational measures in place to ensure the processing of personal information is lawful. A strong Governance Framework provides the infrastructure for positive development of the Council's goals and aspirations within an open and transparent culture.

This organisation has an established governance structure:- maintained by Senior Management and overseen by Elected Members (link to Corporate Information Governance Framework).



It is maintained by Senior Management and supports the ongoing, monitoring, assessment and implementation of how personal data is processed and managed. It is aligned with the Council's core strategic values by working together and being accountable for decisions. It seeks to support staff and citizens by ensuring it operates on an Information Governance by design model. It seeks to be open and transparent and to focus on learning and development, by embracing developments and learning from mistakes. It seeks engagement from Elected Members, staff and citizens and understands the importance of accountability for the organisation's actions as a whole.

Consequent to the established framework it is envisaged that the Governance Framework for Information Governance will play a role in shaping the changes, which the Council's Corporate Plan and associated strategies envisage.

Future aspirations

- I. To ensure that Elected Members and staff continue to understand the Governance Framework;
- II. To ensure that the Governance Framework remains robust in order to ensure citizens remain confident in the Council's ability to handle their information appropriately and securely;
- III. To ensure that the Governance Framework continues to test and support the future envisaged changes and remains relevant in order to be effective;
- IV. The Governance Framework continues to promote a culture of good Information Governance.

2. Awareness and Transparency

Awareness and Transparency are key to Information Governance as they ensure that the Council operates by design and not by default. They require the organisation to ensure that Elected Members and staff understand the importance of data and appropriateness of use, for citizens to have confidence in the Council and its use of information. Citizens need to be able to access non-confidential information about the Council and its services readily and easily. Citizens need to be able to raise concerns and have them considered. The Council needs to be accountable for its use of information.

The Council currently endeavours to ensure that these key issues are met via:-

- Training

The Council has a dedicated Organisational Development Division, training is provided via the Division with technical input from relevant parties such as the SIRO, Head of Digital Services, Business and Compliance Manager for ICT and Data Protection Officer. The Division assumes overall responsibility for the Council's appraisal systems. The Council aspires to improve training opportunities via the use of media platforms, the internet and comms. It utilises hub pages and runs campaigns.

- Processes

The Council has a number of policies in place relating to Information Governance these include:-

Data Protection Policy

<https://staffnet.valeofglamorgan.gov.uk/Documents/Directorates/Resources/Democratic-Services/Data-Protection-Policy-2018.pdf>

Data Protection Procedures

<https://staffnet.valeofglamorgan.gov.uk/Documents/Directorates/Resources/Democratic-Services/Data-Protection-Procedures.pdf>

Employees Information Security Responsibilities

<https://staffnet.valeofglamorgan.gov.uk/Documents/Directorates/Resources/Democratic-Services/Data-Protection-Procedures.pdf>

- Use of media and internet for Communication

The Council has dedicated pages of information in relation to Information Governance and is developing a programme of campaigns for staff.

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/Legal/Data-Protection/Data-Protection.aspx>

<https://www.valeofglamorgan.gov.uk/StaffnetPlus/en/Staff-News-Stories/2023/May/Learn-about-data-breaches-with-Data-Breach-Bobi.aspx>

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/Democratic-Services/Information-Unit/WASPI/WASPI-Resource-Portal.aspx>

The Council has front facing information for its Citizens so that they know how to make requests for information:-

https://www.valeofglamorgan.gov.uk/en/our_council/freedom_of_information/Requests-for-Information.aspx

The Council tells citizens how it uses their information and how it retains their information and what they can do if they are unhappy:-

https://www.valeofglamorgan.gov.uk/en/our_council/Website-Privacy-Notice.aspx

- Personnel

A key part of the Governance Framework is a dedicated team of Information Governance Officers who provide support to all service areas in handling requests for information generally and those requests for information about individual rights under the Data Protection Act. They also provide advice and support around data sharing and data breaches. The Team is supported corporately by Officers in other service areas known as “Data Champions” and other key Corporate Resources functions such as ICT, Business Improvement Team and Legal Services. Team members have dedicated software to assist them in their duties and the Corporate Framework ensures that awareness is embedded into the strategic decision making of the Council.

Future aspirations

The Council aspires to build upon these foundations to provide Elected Members and staff with further information and tools relating to Information Governance in order to maintain and further develop a positive information management culture.

It aspires to ensure that:-

- i. The existing guidance and training is user friendly and engaging and up to date where necessary;
- ii. To supplement the additional guidance and training with engaging information that reflects the use of IT and innovation as well as resolving any gaps in current guidance;

- iii. To widen understanding across the Council of Information Governance by engagement with service areas and by the use of campaigns and communication initiatives
- iv. The Digital Strategy, in particular Theme 4, Data and Insight, Commitment 2 is important to these aspirations as it highlights the importance of a Data Strategy and Data specialists, which will support the Information Management strategy's aspirations.

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3. Secure and Safe Systems (with Effective Incident and Breach Response Management)

The Council recognises that in the last three years the manner in which its Elected Members and staff have worked and how citizens access services and information has rapidly changed in a number of areas. As with other Councils and organisations, a larger proportion of Elected Members and staff now often work remotely or on a hybrid basis. Council meetings are often undertaken virtually or in person. The Council already had structures in place regarding these areas and these have been developed further in the last three years. However, the Council also recognises that it is important not to forget the more traditional working and communication structures either. Currently, the Council has a number of processes and systems in place to ensure that data is utilised securely and safely. These are highlighted below. The advent of the Digital, Workforce and forthcoming Data strategies will further develop and inform change to meet the different ways of working and service provision.

Employees Information Security Responsibilities

<https://staffnet.valeofglamorgan.gov.uk/Documents/Directorates/Resources/Democratic-Services/Data-Protection-Procedures.pdf>

ICT Code of Conduct, Removable Media Devices Policy & Removable Media Policy

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/ICT/ICT-Service-Desk/ICT-Policies.aspx>

How to guides:-

- Use secure e-mail

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/ICT/ICT-Service-Desk/Secure-Email.aspx>

- Store data in a secure database

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/Performance-and-Development/Customer-Relations/Project-TRIM/Project-TRIM.aspx>

- Using Office 365

<https://staffnet.valeofglamorgan.gov.uk/Staff-Central/Office-365/Microsoft-365.aspx>

- Managing Information Securely

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/Legal/Data-Protection/Managing-Information-Securely.aspx>

It also has a dedicated ICT helpdesk to assist with electronic /computer based issues and Cyber Security. Cyber Security is recognised as an important facet to ensuring safe and secure systems.

There are a number of dedicated officers responsible for managing security incidences and data breaches, which staff across the Council are aware of. It has a SIRO and Deputy SIRO and Data Protection Officer and its Information Governance Board considers incidences and breaches on a monthly basis, which are reviewed in order to improve existing systems and learn from such instances. As well as to consider areas for improvement or to recognise vulnerabilities.

The Council's established processes for Security breaches and Data Breaches:-

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/Legal/Data-Protection/Reporting-Security-Breaches.aspx>

<https://www.valeofglamorgan.gov.uk/StaffnetPlus/en/Information-Governance/Data-Breaches.aspx>

The Council has sought to review how it raises awareness by the use of campaigns and other communication initiatives.

Whilst there has been a significant move away from office based working and paper records in recent years, the Council also recognises that due to the nature of a number of its service areas it has a significant amount of paper records. Its policies and procedures recognise this and it has a dedicated records management unit as well as a retention policy, which encompasses all types of records.

<https://staffnet.valeofglamorgan.gov.uk/Directorates/Corporate-Resources/Democratic-Services/Information-Unit/Record-Management-Unit.aspx>

Future aspirations

The Council recognises that the use of more innovative software and IT means that it is likely to see:-

- Greater use of Automated Decision Making, profiling, Use of Machine Learning and Artificial intelligence
- Cyber Security becoming of greater importance
- Merger of data using more sophisticated software and data sets
- A reduction in paper records
- Staff and citizens operating on a more virtual platform

The Council aspires to ensure that:-

- i. The existing guidance and training keep pace with the changes ahead;

- ii. Development of new guidance and training takes account of new innovative ways of working and the use of new IT solutions and seeks to resolve gaps in any currently available guidance;
- iii. There is consideration and review as appropriate of its retention of paper records to include those within the RMU (Records Management Unit) and held within service areas;
- iv. There is consideration and review as appropriate of records held electronically by service areas as the use of data is developed in line with the Digital and Data Strategies;
- v. A framework for Elected Members, staff and citizens is provided that ensures data is safe and secure however it is received and managed;
- vi. There is a culture of good Information Governance.

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4. Robust and Transparent Data Managing and Handling

The Council understands that it manages and handles data in many different ways. By the nature of its business, it covers a diverse number of services and therefore handles personal information of citizens within a wide spectrum. Each service area maintains accountability for the handling of information specific to that area.

It recognises that the way in which the Council shares data and manages its data is under a period of significant change. It understands how it uses data is evolving and that a key element of the evolution is to ensure data is utilised more efficiently and streamlined, the Digital Strategy and Data Strategy being fundamental.

The Council recognises its obligations to data subjects and their rights under the Data Protection Act. It appreciates that it needs to be more unified in its approach to the recording of data. It also recognises the need for transparency regarding the information it holds where ever possible for citizens and the importance of the infrastructure in place to manage requests for information. Such requests ranging from Subject Access Requests, Freedom of Information requests, Environmental Information Regulation requests, requests for information or information provided via consultation processes or its democratic processes.

Set out earlier in this strategy are the reference points to the Council's information and guidance in these areas.

Future aspirations

The Council provides guidance as set out in this strategy to support these areas. It recognises however that it is in this area it will make the most changes over the next four years.

- i. A centralised register for data sharing of personal information of data subjects is being improved and a culture of understanding around the importance of understanding the data collected, its security and whom it is shared with and how is under progression and a key element within the Digital and Data Strategies. This is a significant piece of work and will be important as part of this strategy;
- ii. Greater knowledge and understanding around data sharing and the governance required to underpin data sharing will be developed through a variety of different routes which will include guidance being provided via different platforms and comms;
- iii. A greater harnessing of data around the nature of requests made by citizens and responses provided in order to provide a greater measurement of how this Council handles this area;

- iv. A greater sharing of practice knowledge with colleagues internally and externally as well as continuing to engage with regulators, such as the Information Commissioners Office (ICO).

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Strategy Implementation, Monitoring & Review

The ambitions contained in this Strategy have been developed into an action plan which are set out in (Appendix A). This identifies a series of actions required to deliver the ambitions, the responsible colleague and date by which these actions are due to be completed.

The action plan, and overall progress of the Strategy will be monitored by the Information Governance Board, with regular updates to the Strategic Insight Board, and Strategic Leadership Team.

The Strategy will be reviewed annually.

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Appendix A: Action Plan

The future aspirations identified in the Strategy will be actioned as following.

Ref	Aspiration	Action(s) Required	Responsible	Due Date
1.i	To ensure that Elected Members and staff continue to understand the Governance Framework	Continued development of internal comms and training	Operational Manager of Democratic Services/DPO	May 2027
1.ii	To ensure that the Governance Framework remains robust in order to ensure citizens remain confident in the Council's ability to handle their information appropriately and securely	Framework is reviewed in line with the implementation of the Digital and Data Strategies	DPO/SIRO/Head of Digital	2024-2028
1.iii	To ensure that the Governance Framework continues to test and support the future envisaged changes and remains relevant in order to be effective;	Framework is reviewed in line with the implementation of the Digital and Data Strategies	DPO/SIRO/Head of Digital	2024-2028
1.iv	The Governance Framework continues to promote a culture of good Information Governance.	Continued development of support and awareness via training, comms and guidance with keeps pace with the Digital and Data strategies	DPO/SIRO/Head of Digital	2024-2028
2.i	The existing guidance and training is user friendly and engaging and to update where necessary.	Guidance and training to be reviewed alongside development of Digital and Data strategies	As above	2024-2028
2.ii	To supplement the additional guidance and training with engaging information that reflects the use of IT and innovation as well as resolving any gaps in current guidance.	Guidance and training to be reviewed alongside development of Digital and Data strategies	As above	2024-2028

2.iii	To widen understanding across the Council of Information Governance by engagement with service areas and by the use of campaigns and communications initiatives.	Development of guidance that keeps pace with the Digital and Data strategies and is shared with Officers and Members through a variety of comms options as appropriate	DPO/SIRO/Head of Digital/Operational Manager for Democratic Services	2024-2028
3.i	The existing guidance and training keeps pace with the changes ahead.	Development of guidance that keeps pace with the Digital and Data strategies and is shared with Officers and Members through a variety of comms options as appropriate	DPO/SIRO/Head of Digital/Operational Manager for Democratic Services	2024-2028
3.ii	Development of new guidance and training takes account of new innovative ways of working and the use of new IT solutions and seeks to resolve gaps in any currently available guidance.	Development of guidance that keeps pace with the Digital and Data strategies and is shared with Officers and Members through a variety of comms options as appropriate	DPO/SIRO/Head of Digital/Operational Manager for Democratic Services	2024-2028
3.iii	There is consideration and review as appropriate of its retention of paper records.	A review of paper records held and the retention policy and schedule to include those within the RMU and Service Areas.	Operational Manager for Democratic Services & all IAOs (Information Asset Owners- AKA Directors)	2024-2028
3.iv	There is consideration and review as appropriate of records held electronically by service areas as the use of data is developed in line with the Digital and Data Strategies;	A review of electronic records on a Service by Service area basis as new ways of using and harnessing data are established to a more efficient way of working.	All IAOS & Head of Digital	2024-2028
3.v	A framework for Members, staff and citizens is provided that ensures data is	Framework exists but should be reviewed and amended alongside the implementation of the Digital and Data	DPO/SIRO/Head of Digital/Operational	2024-2028

	safe and secure however it is received and managed.	Strategies to ensure it remains relevant and robust.	Manager for Democratic Services	
3.vi	There is a culture of good information governance.	By completing the other actions in this plan.	IGB	2024-2028
4.i	A centralised register for data sharing of personal information of data subjects is being improved and a culture of understanding around the importance of understanding the data collected, its security and whom it is shared with and how,	A register has been commenced there is ongoing work in this action. The other actions also support this around comms and guidance.	DPO & IAOs	2024-2028
4.ii	Greater knowledge and understanding around data sharing and the governance required to underpin data sharing,	This will be progressed by virtue of the actions set out earlier in this plan.	DPO	2024-2026
4.iii	A greater harnessing of data around the nature of requests made by citizens and responses provided in order to provide a greater measurement of how this Council handles this area.	This will be progressed by the implementation and use of the Digital and Data Strategies.	DPO/Head of Digital Services/IAOs	2024-2028
4.iv	A greater sharing of practice knowledge with colleagues internally and externally as well as continuing to engage with regulators (such as The Information Commissioner's Office (ICO)).	This will be progressed by the earlier actions in this plan.	DPO	2024-2028

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