

Classification	Item No.
Open	

Meeting:	Audit Committee
Meeting date:	8 December 2025
Title of report:	Information Governance Update
Report by:	Helen Corbishley, Head of Performance and Delivery and Data Protection Officer
Decision Type:	For Information
Ward(s) to which report relates	All

Executive Summary:

Information Governance (IG) is the strategy or framework for handling personal information in a confidential and secure manner to appropriate ethical and quality standards, ensuring compliance with the relevant statutory and regulatory requirements. This report highlights improvements in training compliance, performance at responding to requests for information and dealing with data breaches.

Recommendation(s)

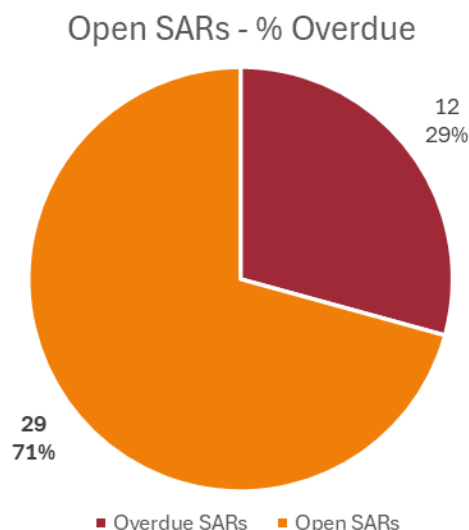
That Audit Committee note the performance from 1 October 2024 to 30 September 2025

Key considerations

Background

This report is to update Audit Committee on the Council's Information Governance activity from 1 October 2024 to 30 September 2025. As mentioned in previous reports to Audit Committee, these reports now focus on the Council's 'business as usual' performance in the delivery of Information Governance.

- **Subject Access Requests (SAR) and SAR reviews**

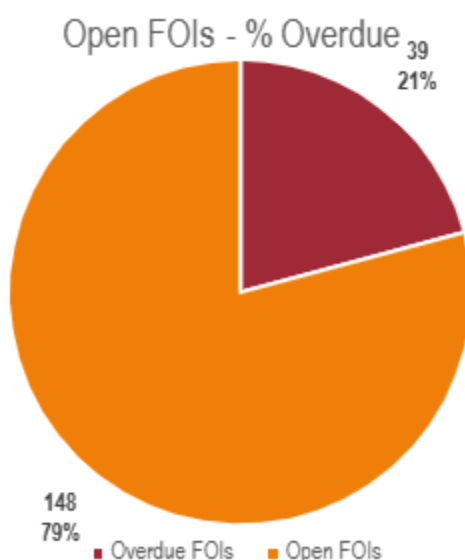


The current position for open SARs is as above. Out of those open, 12 are overdue.

From 1 October 2024 to 30 September 2025 the team received 348 SARs for across the Council, including Housing Services. This is an increase on the previous year in volume and complexity.

Processing SARs is capacity heavy and in order to improve compliance in this area a new policy is being developed which formalises the use of Microsoft E-Discovery software to wider team members in the department in order to conduct data searches. This should increase capacity to respond to SARs requests. In addition an investment case is being drafted to procure software which supports FOIs, EIRs and SARs processes and provides redaction support which should make processes more efficient and increase compliance.

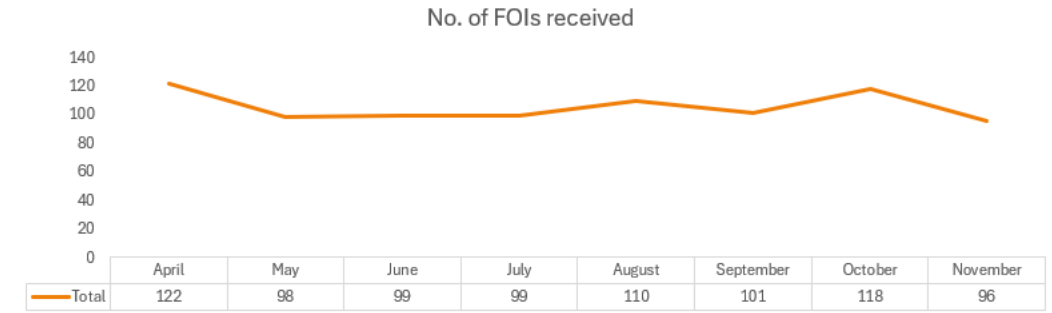
- **Freedom of Information (FOI) Requests/**



The current position for open FOIs is as above. Out of those open, 39 are overdue.

From 1 October 2024 to 30 September 2025, the Council received 1299 FOIs from across the Council including Housing Services.

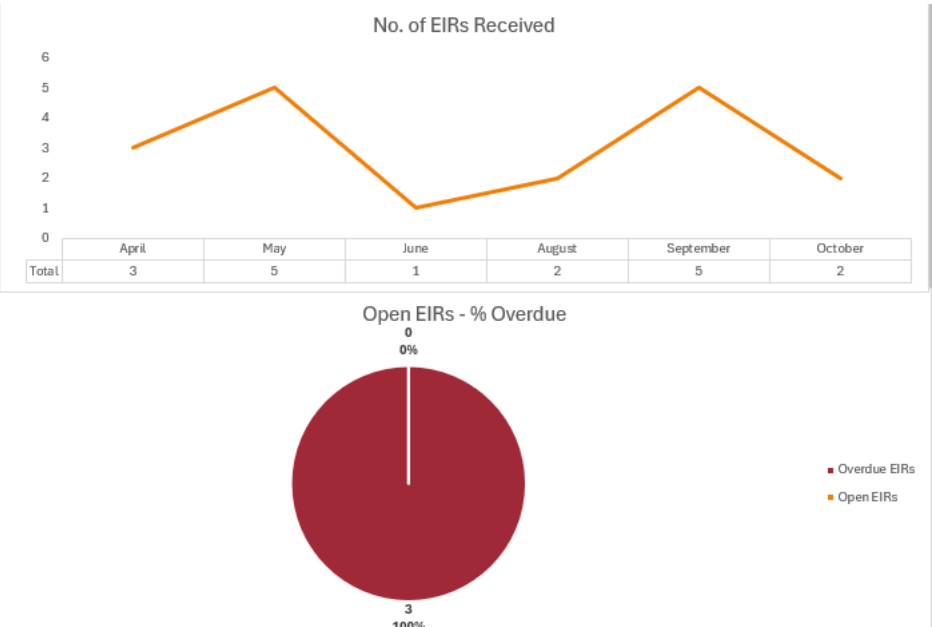
Since this financial year the monthly volume has been on average around 100 FOIs being received each month.



As above, an investment case is being drafted to procure case management software to support the processing of IG activity. This should develop more efficient tasks for members of the Policy and Compliance Team, improve reporting and use intelligence to understand repeat requests.

- Environmental Information Reviews**

50 EIRs have been received in the 12 month period of October 24 to September 25. The chart below shows the current status for 2025/26 monitoring. There are currently no overdue EIRs.



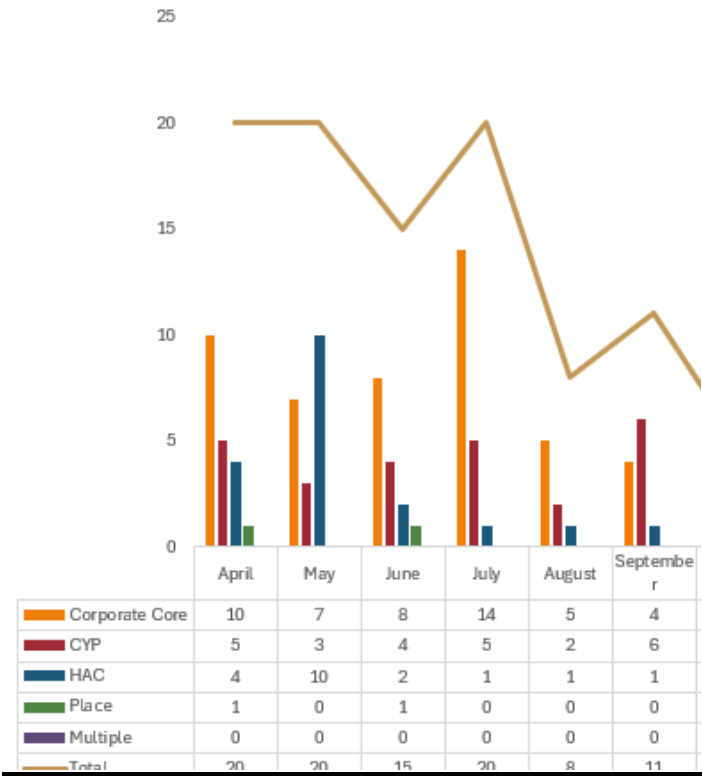
In 2025/26 EIRs have only been received for the Place and Corporate Core departments. There has been no concerns around compliance in responding to EIRs.

1 EIR response was followed up in October by the ICO casework team as the requestor had complained about the availability of data that was provided. The ICO concluded that the Council’s position on this matter was correct.

- Data Breaches**

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25
Total	9	10	20	13	17	18	20	20	15	20	8	11

From 1 October 2024 to 30 September 2025, the Council recorded 181 data breaches. These have been reported through the Governance and Assurance Board since the beginning of the year. Governance and Assurance Board receive regular monitoring on data breaches by department:

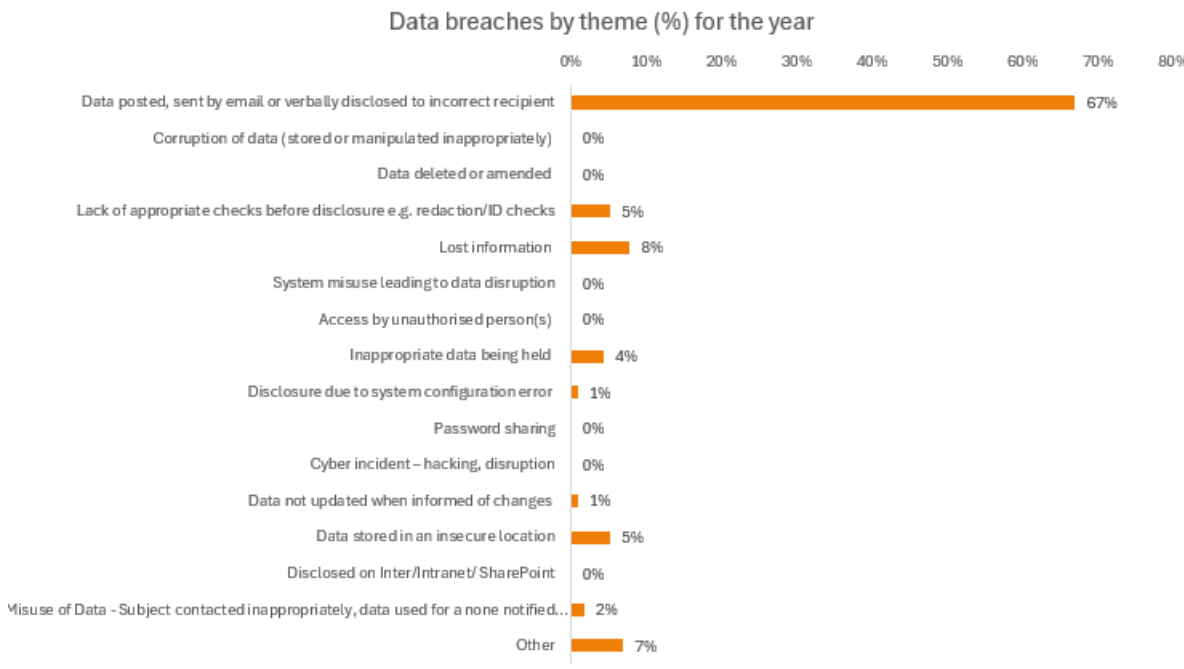


In addition through Governance and Assurance Board the Data Protection Officer has put in recommendations to mitigate the occurrence of data breaches such as:

- Applying a two minute time delay on emails when sending
- Additional training to teams where high occurrences of breaches are present
- Considering future use of removing auto-fill from Microsoft Outlook

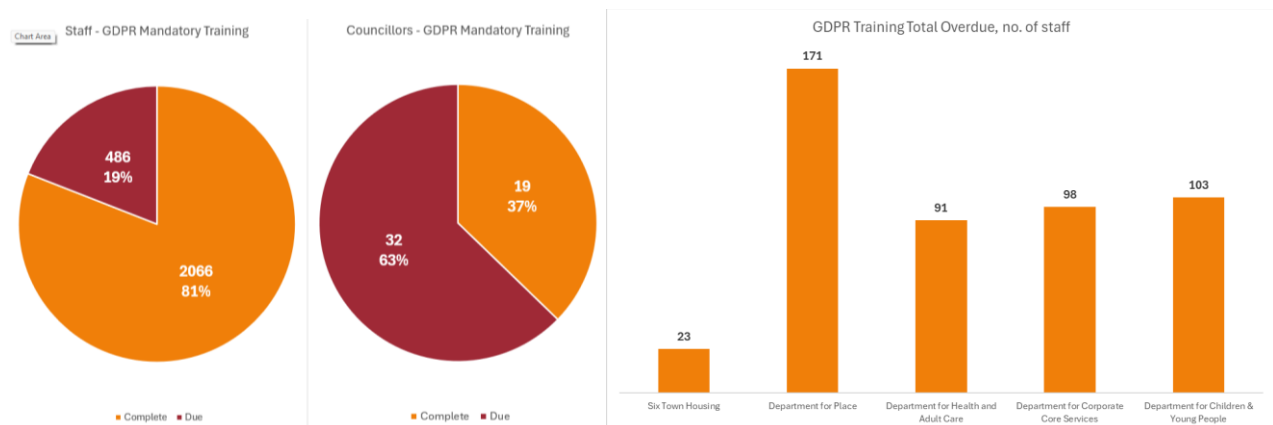
Where appropriate the ICO test has been used for data breaches. There has been no occasions where we have had to escalate a data breach due to severity to the ICO.

The chart below shows the main theme for data breach occurrence is data posted, sent by email or verbally disclosed to the incorrect recipient with 67% of cases since the start of the year.



- GDPR Training**

Current GDPR training non-compliance figures are set out below:



Department	Housing	Place	Health & Adult Care	Corporate Core	Children & Young People	Total

Total no of staff	115	677	610	559	591	2552
No and % of Staff not compliant	23, 20%	171, 25%	90, 15%	98, 18%	103, 17%	486, 19%

A spreadsheet of non-compliant officers is regularly considered by IG Officers, the Executive, Senior Leaders, and the Corporate Governance Group. The officers' names are highlighted to Executive Directors and Assistant Directors to ensure training is completed in the following two weeks where possible, and reasons why are fed back when not.

Equality Impact and considerations:

Equality Analysis	<i>Please provide a written explanation of the outcome(s) of either conducting an initial or full EA.</i>
N/A	

Assessment of Risk:

The following risks apply to the decision:

Risk / opportunity	Mitigation
Without a robust framework in place to support good Information Governance practice, there is a risk that the Council may not comply with the duties set out in the UK General Data Protection Regulations (GDPR) or Data Protection Act leading to possible data breaches, loss of public confidence, reputational damage and prosecution / fines by the Information Commissioner.	Approval and Implementation of the Information Governance Framework. Implementation of a comprehensive Information Governance work programme.

Legal Implications:

This report provides an update to audit committee regarding the embedding of our obligations across the organisation. The report references the Council's statutory duties and obligations under the UK GDPR, Data protection Act 2018, FOIA and associated legislation and guidance. The Council has duties under this legislation in terms of

accountability and compliance and must ensure it has appropriate policies and procedures in place. A failure to ensure compliance could result in enforcement action by the ICO.

Financial Implications:

With the exception of the procurement of appropriate training there are no direct financial implications arising from this report. However, there are implications in relation to a potential ICO fine if the Council had a data breach and the ICO found that we as an organisation were negligent.

Report Author and Contact Details:

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Background papers:

Report to Audit Committee 12 October 2023 -

<https://councildecisions.bury.gov.uk/documents/s37322/IG%20Report%20to%20Audit%20Committee%20Oct%2023.pdf>

Please include a glossary of terms, abbreviations and acronyms used in this report.

Term	Meaning
BGI	Business Growth and Improvement
CYP	Children and Young People
DPO	Data Protection Officer
FOIA	Freedom of Information Act 2000
GDPR	General Data Protection Regulations 2018
HAC	Health and Adult Care
IG	Information Governance
Ops	Operations
ROPA	Record of Processing activity
SAR	Subject Access Request

