

Classification	Item No.
Open	

Meeting:	Audit Committee
Meeting date:	14 April 2026
Title of report:	Information Governance Update
Report by:	Helen Corbishley, Head of Performance, Delivery and Compliance 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 up until 28 February 2026.

Key considerations

Background

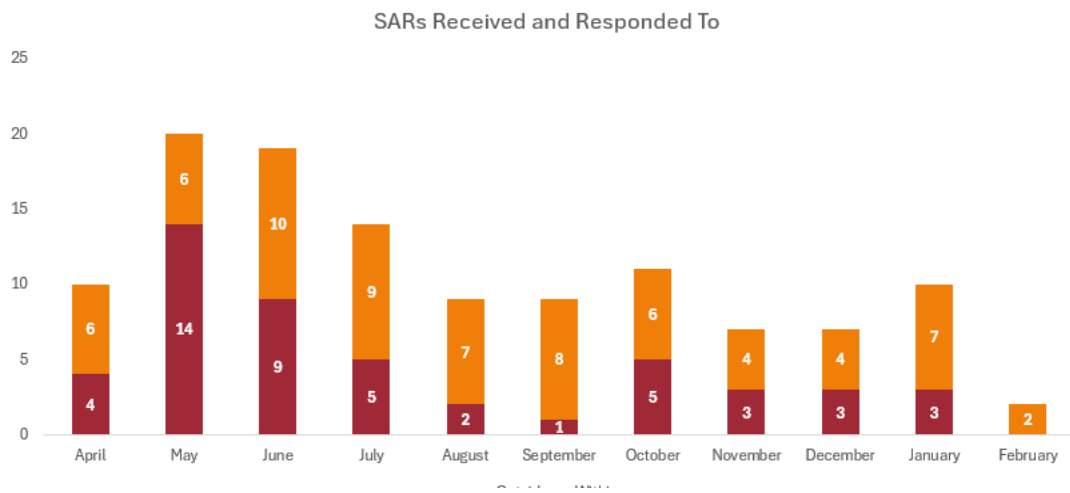
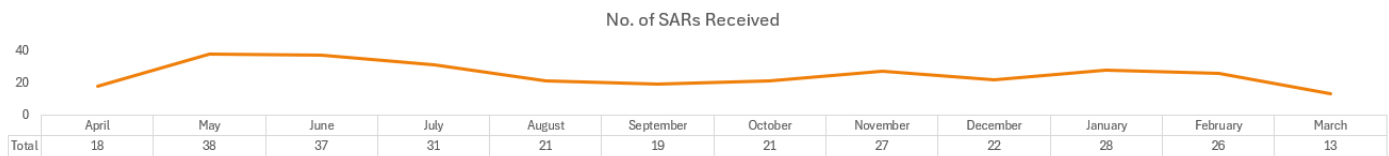
This report is to update Audit Committee on the Council's Information Governance activity from up until 28 February 2026. As mentioned in previous reports to Audit Committee, these reports now focus on the Council's performance in the delivery of Information Governance.

- This report sets out the Authorities activity across Freedom of Information, Subject Access Requests and Environment Information requests. Under Freedom of Information Act 2000 (FOIA) Public authorities must confirm or deny whether information is held and respond within 20 working days, subject to relevant exemptions.

Under UK GDPR and Data Protection Act 2018 in relation to Subject Access Requests (SARs): Individuals are entitled to access their personal data. Responses must be provided within one month, extendable by two months for complex or numerous requests.

Environmental Information Regulations 2004 (EIR): Environmental information requests must be answered within 20 working days, extendable to 40 working days for complex requests. EIR has a presumption of disclosure, with exceptions interpreted more narrowly than under FOIA.

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

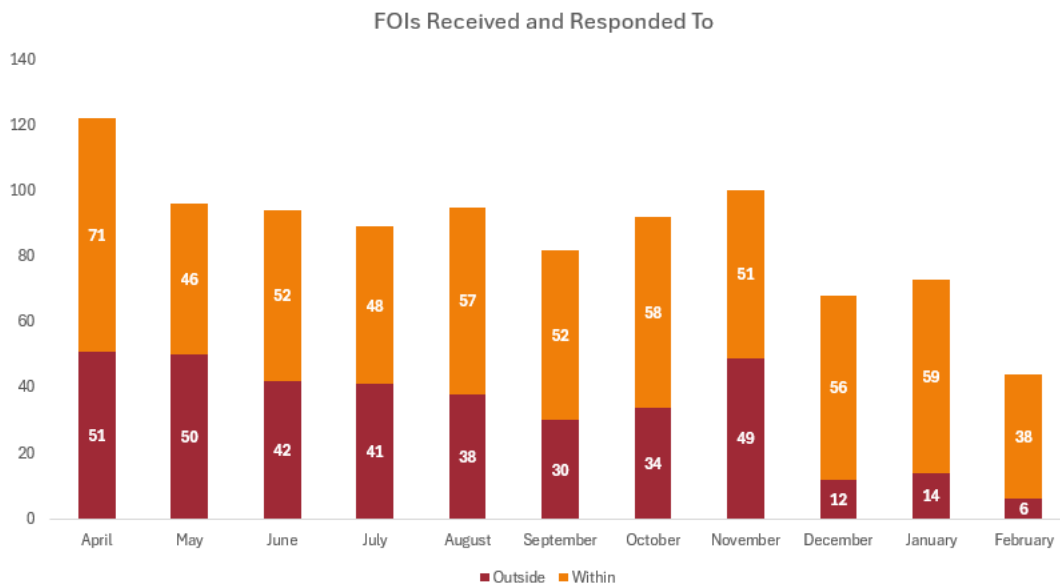
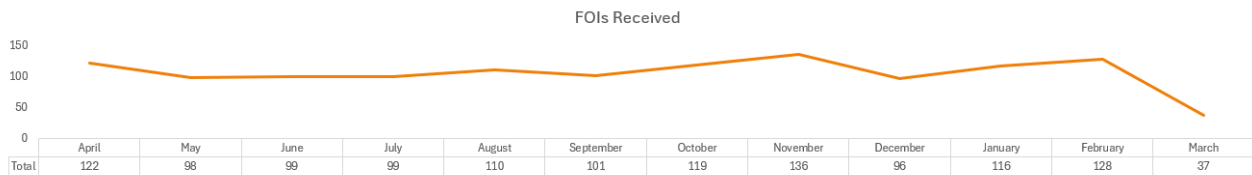


The Council monitors compliance on a monthly basis. The Policy and Compliance Team log all requests received and work with services to ensure that matters are dealt with in a timely manner. The team validate requesters identity as an initial step in the processes. From April 2025 to mid March 2026 the team received 299 SAR requests for across the Council including Housing Services.

This is similar in volume to the previous 12 month average however there has been an increase in complexity. (Please note that the data for this report was taken from early March so will not show a full month of volume for month 12).

Following the introduction of the wider use of the Microsoft E-Discovery software to wider team members in the department in order to conduct data searches, this has resulted in improved timeliness for processing SARs. However, the above does show that increases in volume correlates with decreases with compliance. There has been new software purchased to manage FOIs, EIRs, SARs and Data Breaches. This will be implemented from 1 May 2026 and provide further efficiencies in the process that should reflect in the performance figures going forward

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

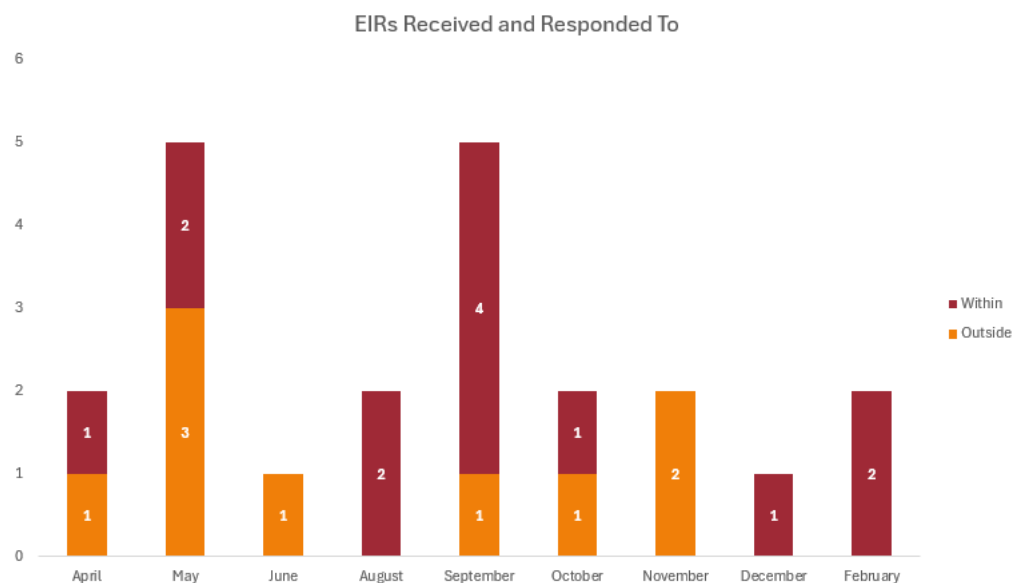
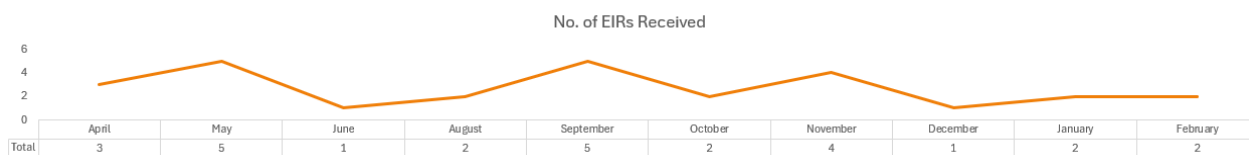


From April 2025 to mid March 2026 the team received 1261 FOI requests for across the Council which is similar to the last rolling 12 month average of 1299. Again there is a correlation between volume of FOIs received and timeliness and compliance.

As above the new software procured to manage FOIs will be implemented from 1 May 2026. This should provide further efficiencies in the process that should reflect in the performance figures going forward. In addition this will allow for improved analysis around common themes requested and repeat requests.

- **Environmental Information Reviews**

27 EIRs have been received from April 2025 to mid March 2026. This is much lower than the previous rolling 12 month average of 50.

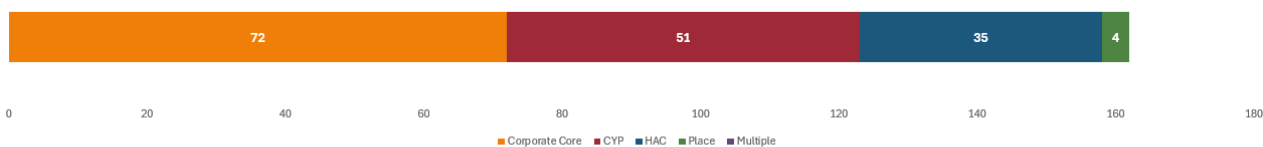


- **Data Breaches**

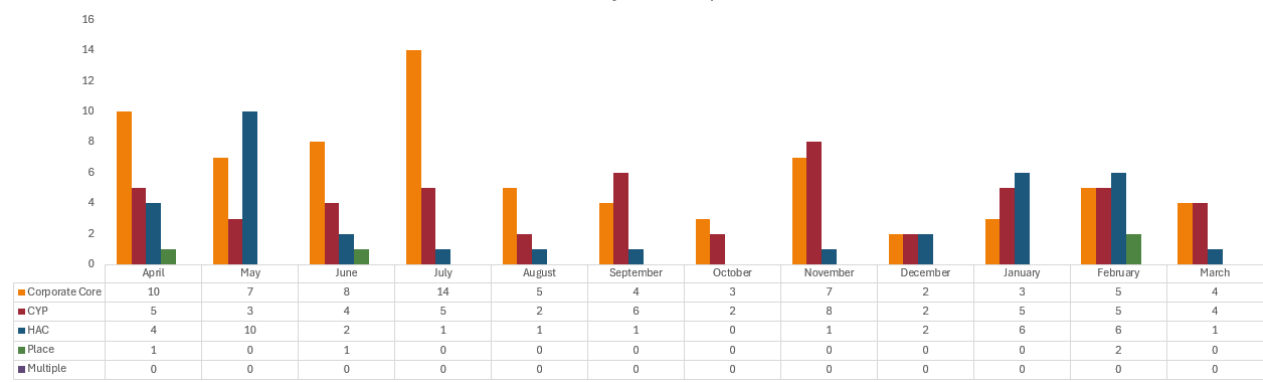
Data Breaches

[Monthly Data Breach Log 25-26.xlsx](#)

Year Total of Data Breaches



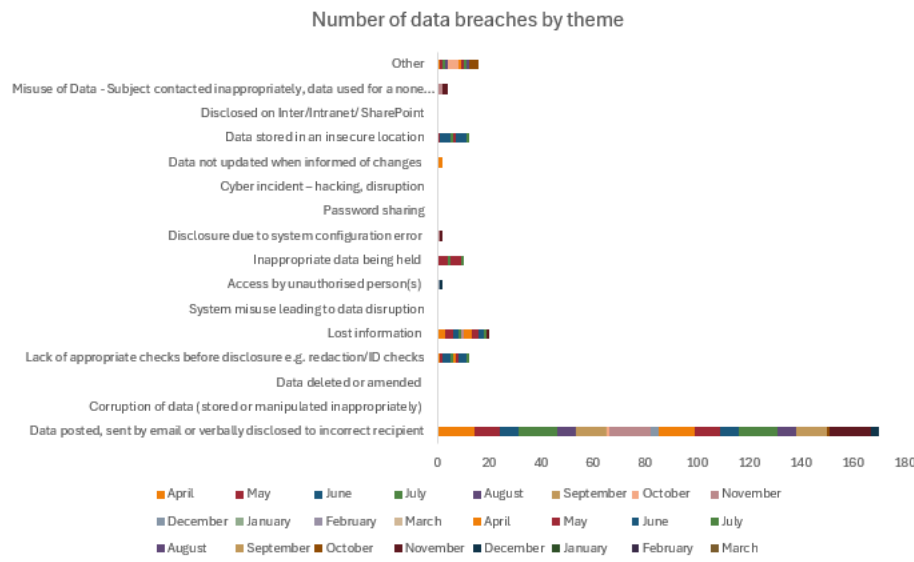
Data Breaches by Month & Department



From April 25 to mid March 26 the Council recorded 162 data breaches. These are regularly reported through Governance and Assurance Board and in addition if meeting threshold are reported to the ICO. Since the last report there has not been any breaches that reach the threshold of concern and action from the ICO. There has however been some significant near

misses. Services are contacted and asked their mitigations when breaches occur. The most common breach reasons are below:

The chart below shows the main theme for data breach occurrence is data posted, sent by email or verbally disclosed to the incorrect recipient.



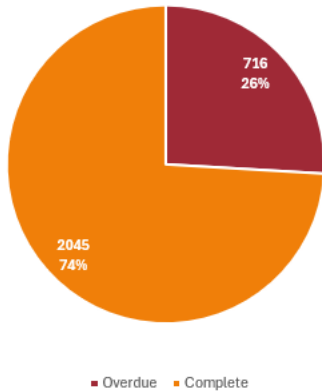
Recent considerations at Governance and Assurance Board and with the Data Protection Officer to improve performance in this area are:

- Applying a two minute time delay on emails when sending
- Supporting managers to use appropriate performance management tools for repeat breaches from individuals
- Considering future use of removing auto-fill from Microsoft Outlook for particular teams

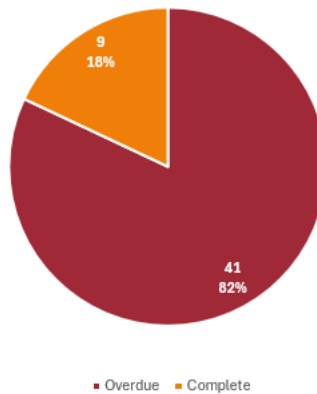
- **GDPR Training**

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

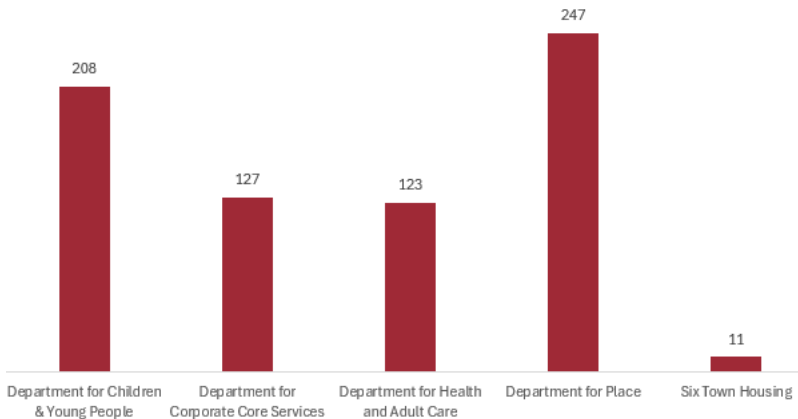
Staff - GDPR Mandatory Training



Members - GDPR Mandatory Training



GDPR Training Overdue, no. of staff



A spreadsheet of non-compliant officers is regularly considered by IG Officers, the Executive, Senior Leaders, and Governance and Assurance Board. In addition a recent deep dive has taken place to improve compliance. There is a proposal in development to develop the training into a cyclical process completed at a particular part of the year – similar to employee reviews rather than a 12 month rolling timetable from the point when the training was last completed. This will provide opportunity to really understand compliance and analyse actual progress. Currently, progress of chasing outstanding training can be masked within monthly reporting by the constant cycle of those dropping out of time each month. In addition work is ongoing to improve data recording and reporting by developing a live data dashboard on training compliance.

Summary and next steps for further improvement

- Overall the data shows increased grip on the IG processes in recent months, increases in monthly compliance which will be supported further by the implementation of new systems over the next year.

- Regular interaction with GM IGEN group which is sharing best practice.
- Individual meetings with service areas where there are backlogs forming are being in place with targeted support from the DPO and Policy Compliance Team.
- There have been two audits completed both for the FOI/SAR process and the ROPA (Record of Processing Activity) which have shown both improvement and assurance of processes. The FOI and SAR audit was completed with a substantial level of assurance in November 2025 and the ROPA audit had two recommendations implemented and two recommendations partly implemented at first follow up in February 2026.
- The Dapian system will go live from May 2026. This web based systems will remove the use of email for chasing and tracking FOI/SAR/EIR and replace with a web based portal which has role based permissions for leads and champions. FOI/SAR/EIRs will be updated through the system, automatically have statutory timescales and reminders built in. The portal has a reporting function which will provide live status at any time. This system can be built around the correct team and service contacts to ensure that requests are not missed. Tasks can be assigned to users, information searches logged and reused and it has a live calendar flagging expiry dates for each case.
- Further work is ongoing around improving wider processes across the Policy and Compliance Team to improve the content particularly of FOI requests. This includes checking Cllr and MP casework to see if a response has already been provided which would then avoid a new FOI being allocated to services.
- After the initial implementation of Dapian new training sessions will be put in place for leads and champions to look at appropriate FOI responses, when data is held or recorded and the use of exemptions.

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	Approval and Implementation of the Information Governance Framework. Implementation of a comprehensive Information Governance work programme.

prosecution / fines by the Information Commissioner.	
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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%202023.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