

Classification	Item No.
Open	

Meeting:	Audit Committee
Meeting date:	19 October 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 for the first 6 months of 2026/27.

Key considerations

Background

This report is to update Audit Committee on the Council's Information Governance activity and performance from April to September 2026 across FOIs, SARs and EIRs.

Timescales:

- 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.

Freedom of Information (FOI) Requests

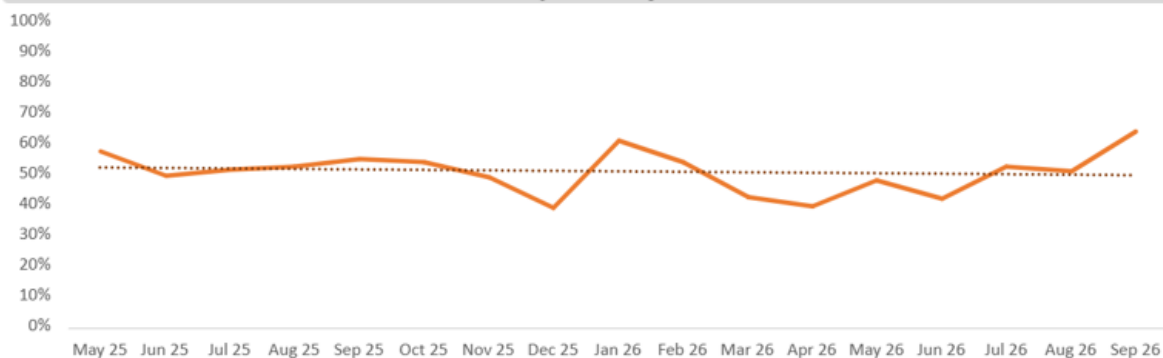
Freedom of Information Requests (FOIs) - September 26

Compliance Rate - Sep
64%

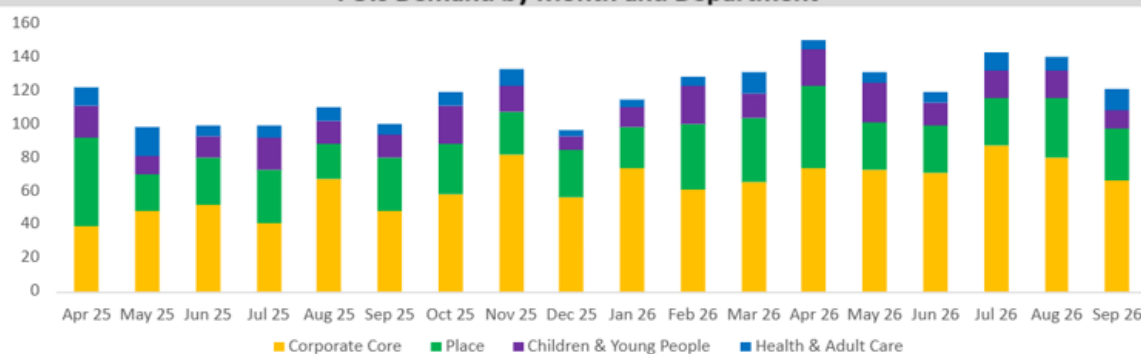
Open FOIs
109

FOIs Outside Timescales
53

FOIs Compliance by Month



FOIs Demand by Month and Department



There are currently 109 open Freedom of Information (FOI) requests, of which 53 have exceeded the statutory response deadline.

Between April 2026 and September 2026, the Council received 804 FOI requests, compared to 628 requests during the same period in 2025, representing a 28% year-on-year increase in demand.

The majority of requests continue to be allocated to the Corporate Core and Place departments. Feedback from authorities across Greater Manchester and nationally indicates that this increase is part of a wider trend, driven by both the growing use of AI tools to generate information requests and an increasing public appetite for accessing information.

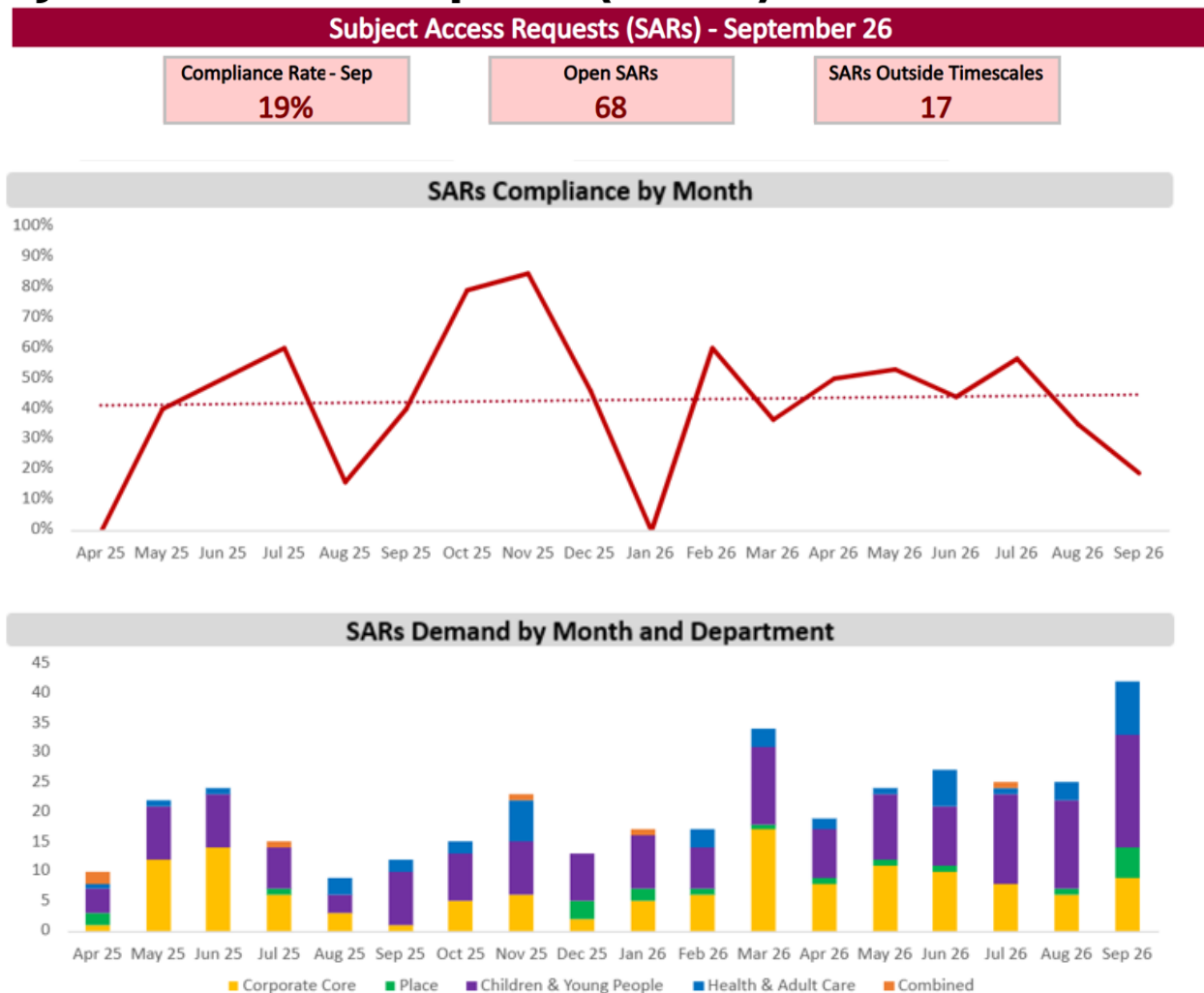
The increase in request volumes has correlated with a decline in compliance against statutory timescales. This was recognised during the summer, and a targeted compliance improvement programme was launched alongside changes to local processes to support sustainable performance improvements.

Key actions implemented included:

- Revising the allocation process so requests are assigned to senior managers.
- Introducing weekly performance and chase reporting.
- Delivering dedicated training and support for managers and operational teams.
- Reviewing backlog cases and providing intensive support and additional capacity to reduce overdue requests.
- Migrating teams to the new FOI case management system, Dapian.

The recent improvement in compliance rates provides early evidence that these interventions are having a positive impact. Whilst challenges remain due to the sustained increase in demand, performance has shown an upward trajectory as the new processes have become embedded, with a continued focus on reducing the backlog and improving timely responses to information requests

Subject Access Requests (SAR) and SAR reviews



There are currently 68 open Subject Access Requests (SAR) requests, of which 17 have exceeded the statutory response deadline.

Between April 2026 and September 2026, the Council received 161 SAR requests, compared to 92 requests during the same period in 2025, representing a 75% year-on-year increase in demand.

The majority of requests continue to be allocated to the Corporate Core and Children and Young People departments. This correlates with the request types as they tend to be requestors wishing to view information held when they have been or currently are under our social services remit or requests from previous or current members of staff.

The increase in request volumes has also correlated with a decline in compliance against statutory timescales. This was recognised within the above compliance sprint and the following actions have been put in place:

- Revising the allocation process so requests are assigned to senior managers.
- Introducing weekly performance and chase reporting.
- Centralising processes around data searches, bulk PDFing and redaction
- Developing a business case for an AI redaction tool to release capacity
- Offering customers secure links to share information to reduce time taken to share large volumes of binded information over multiple emails

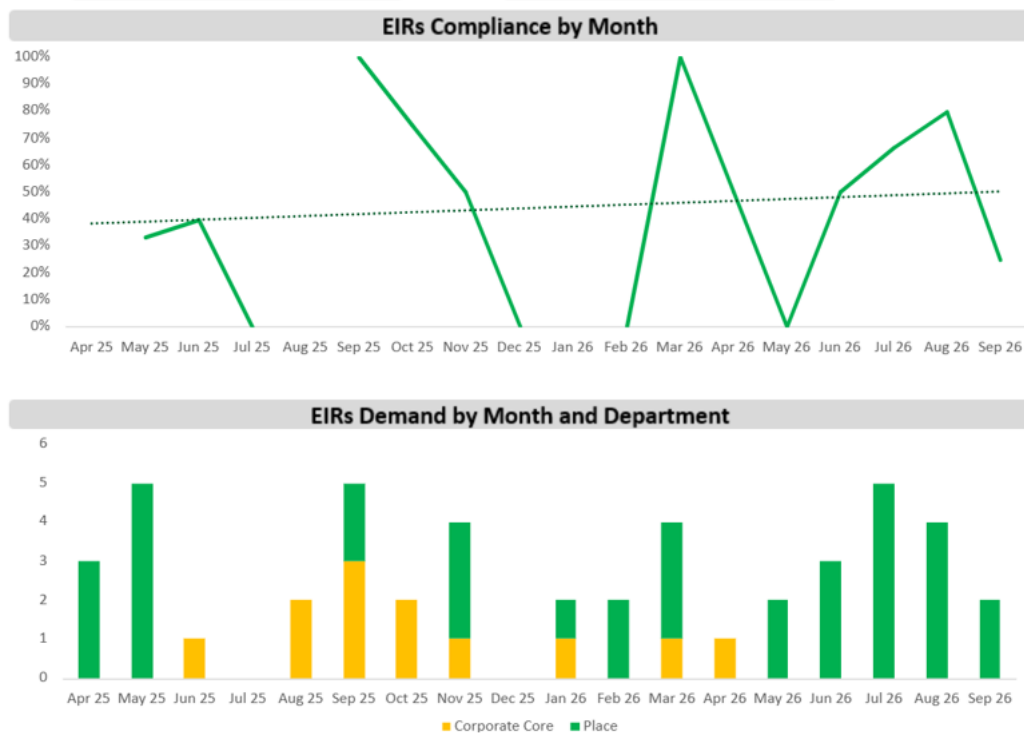
Environmental Information Reviews

Environmental Information Requests (EIRs) - September 26

Compliance Rate - Sep
40%

Open EIRs
4

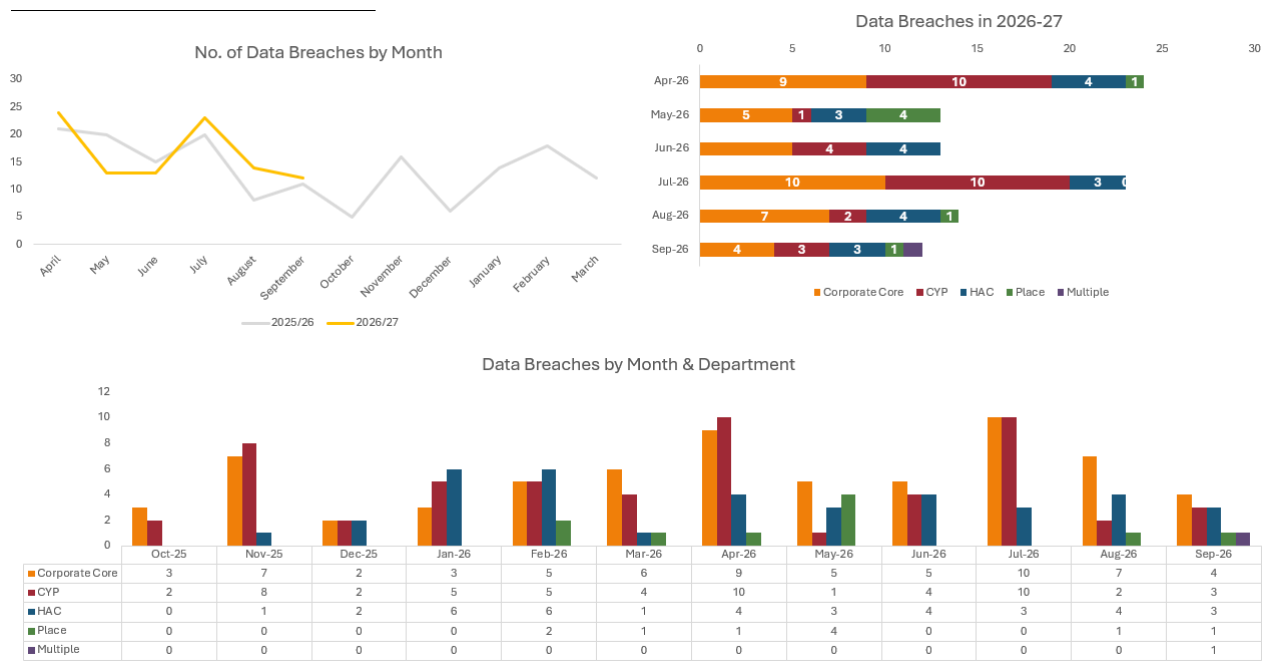
EIRs Outside Timescales
3



There are currently 4 open Environmental Information Requests (EIR) requests, of which 3 have exceeded the statutory response deadline.

The numbers of EIRs remain minimal and can offer additional complexities than usual FOI requests.

Data Breaches



Between April 2026 and September 2026, the Council recorded 105 data breaches. This compares with 166 breaches recorded across the whole of 2025/26, meaning that by the midpoint of the year we have already recorded around two-thirds of last year's total. While this represents an increase in the number of recorded breaches, this is considered a positive indicator as it suggests that staff are becoming more aware of their responsibilities and are reporting incidents that may previously have gone unreported. Reported breaches can be investigated, addressed, and used as learning opportunities to reduce the likelihood of recurrence.

The category of cause for these breaches is as below:

- Data posted, sent by email or verbally disclosed to incorrect recipient: 71
- Lost information: 12
- Other: 7
- Lack of appropriate checks before disclosure e.g. redaction/ID checks: 5
- Cyber incident – hacking, disruption: 2
- Access by unauthorised person(s): 1
- Corruption of data (stored or manipulated inappropriately): 1

Since the last report, there have been no data breaches that met the threshold requiring regulatory concern or formal action by the Information Commissioner's Office (ICO).

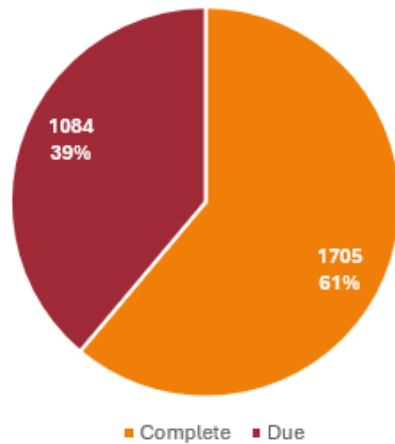
The Governance and Assurance Board continues to monitor data breaches across the organisation. Where trends or repeat breaches are identified, the following mitigations may be implemented:

- 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

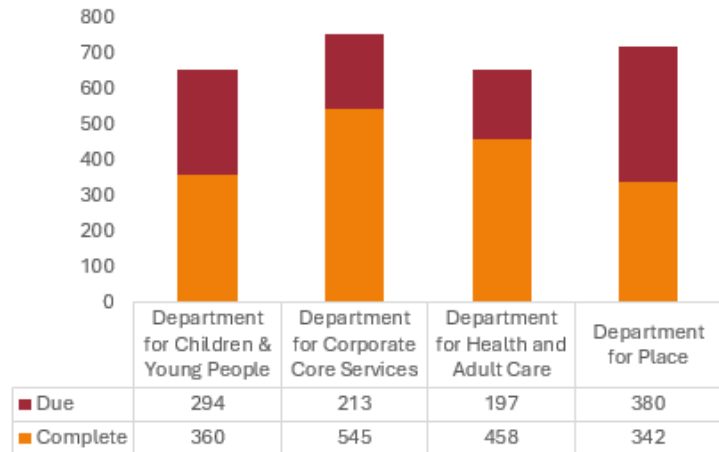
GDPR Training

Current GDPR training compliance figures at September are set out below:

GDPR Training Compliance



GDPR Training Compliance by Department



A spreadsheet identifying non-compliant officers continues to be regularly reviewed by the Data Protection Officer (DPO), Executive Team, Senior Leadership Team, and Governance and Assurance Board to monitor compliance and drive improvement.

The GDPR training programme has been reviewed by the DPO, and a proposal to redesign the training into a structured induction package and an annual refresher programme has been approved by the Executive Team. This revised approach is intended to strengthen compliance and awareness across the organisation and will be launched before Christmas 2026, supported by an internal communications campaign.

As part of this review, tailored training has also been developed for the accountable leads referred to above. In addition, dedicated Freedom of Information (FOI) training, including the application of exemptions, has been delivered throughout October to more than 100 members of staff responsible for preparing and coordinating FOI responses.

Summary and next steps for further improvement

- The first six months of 2026/27 have seen a significant increase in demand across all areas of Information Governance, particularly Freedom of Information (FOI) and Subject Access Requests (SARs). FOI requests increased by 28% compared with the same period last year, whilst SAR volumes increased by 75%. This sustained growth has placed considerable pressure on services and impacted compliance with statutory response times.
- In response, a comprehensive improvement programme has been implemented, including revised request allocation arrangements, strengthened performance monitoring, enhanced management oversight, staff training, backlog reduction activity and the implementation of the Dapian case management system. Early indications show that these interventions are improving performance and providing stronger organisational oversight of information requests.
- The Council has also continued to strengthen its approach to data protection and information governance compliance. Whilst 105 data breaches were reported during the period, no incidents met the threshold for regulatory action by the Information Commissioner's Office. Increased reporting is considered a positive sign of improved awareness and a stronger reporting culture, enabling incidents to be investigated and used as learning opportunities.
- GDPR training compliance remains an organisational priority, supported through regular monitoring by the DPO, Executive Team, Senior Leadership Team and Governance and Assurance Board. A revised training framework, incorporating mandatory induction and annual refresher training, has been approved and will be launched before Christmas 2026. In addition, bespoke training for accountable leads and targeted FOI training for more than 100 officers has further strengthened knowledge and capability across the organisation.
- Overall, the report demonstrates that although demand and complexity continue to increase, significant progress has been made in strengthening governance arrangements, improving accountability, embedding good information management practices and driving improvements in statutory compliance. The continued rollout of Dapian, targeted support for services, ongoing audit activity and enhanced training programmes will further support the Council in meeting its statutory obligations and delivering effective, transparent and secure information governance arrangements.

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 - 14 April 2026

<https://councildecisions.bury.gov.uk/documents/s49347/2025.26%20IG%20Report%20to%20Audit%20Committee.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