

Title of Report	REVIEW OF CORPORATE GOVERNANCE POLICIES - INFORMATION GOVERNANCE FRAMEWORK	
Presented by	Councillor Keith Merrie Finance and Corporate Portfolio Holder PH Briefed <input type="checkbox"/>	
Background Papers	Audit and Governance Committee report 4 February 2026	Public Report: Yes
	Audit and Governance Committee minutes 4 February 2026	Key Decision: No
Financial Implications	The annual refresh and update of the policies is good practice and will enhance financial management within the Council.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	The policies are reviewed annually to ensure any updates in the law are noted so that the Council acts in accordance with the law.	
	Signed off by the Deputy Monitoring Officer: Yes	
Staffing and Corporate Implications	The suite of Corporate Governance Policies is regularly reviewed to ensure the Council operates effectively, in line with the appropriate standards.	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	To seek Cabinet's comments on and approval of the Council's updated corporate governance policies (Information Governance Framework), following review and approval by the Audit and Governance Committee.	
Reason for Decision	To ensure that the Council has an up-to-date suite of governance policies in place reflecting the law and best practice	
Recommendations	THAT CABINET APPROVES THE CORPORATE GOVERNANCE POLICIES LISTED IN PARAGRAPH 1.2 OF THE REPORT.	

1.0 BACKGROUND

1.1 The Council is responsible for ensuring that its business is conducted in accordance with the law and appropriate standards. In discharging this responsibility, the Council has in place arrangements for the governance of its affairs and staff.

1.2 The following documents constitute the Council's suite of Corporate Policies:

Policy	Last Reviewed
Anti-Fraud and Corruption Policy	2025
Anti-Money Laundering Policy	2025
Confidential Reporting (Whistleblowing) Policy	2025
Risk Management Policy	2025
RIPA Policy	2025
Local Code of Corporate Governance	2025
Information Governance Framework	2024
Data Protection Policy	2024
Information Security Policy	2024
Information Rights Policy	2024
Records Management Policy	2024

1.3 Cabinet considered six of the policies within the Council's suite of Corporate Policies at its meeting on 23 September 2025. At that meeting, it was advised that the documents comprising the Information Governance Framework were undergoing a more thorough review, which had taken longer than expected due to the fact it involved cross-working between various services, including Information Governance and IT. For that reason, the Information Governance Framework documents were brought to the meeting of the Audit and Governance Committee on 4 February 2026 for the Committee's views ahead of consideration by Cabinet. The Committee did not have any comments on the policies.

2.0 POLICY REVIEW

2.1 The policies have been reviewed by the relevant officers responsible for them. The main changes to each policy are summarised below. It is also noted that not all sections of the Data (Use and Access) Act 2025 have come into force, and further updates may be required when the remaining parts of the Act are enacted. The policies have, therefore, been updated to acknowledge that the policy owner has authority to make minor changes as a result of any changes in legislation and/or guidance.

Information Governance Framework

The Framework has been updated to include reference to the Privacy and Electronic Communications Regulations 2003 and the Data (Use and Access) Act 2025 as relevant legislation. Reference to the Surveillance Camera System Senior Responsible Officer has been removed, as this will now separately form part of the Surveillance Camera Technologies Procedure, with reference to this being made in the Policies and Procedures section.

Data Protection Policy

The policy has been updated to include reference to the Data (Use and Access) Act 2025, and has undergone a substantial update in respect of CCTV and Surveillance Camera Technologies at Paragraph 7, to refer to the Council's Procedure which will deal with the use and management of surveillance cameras and is to be read in conjunction with the Data Protection Policy.

Information Security Policy

This policy has undergone a substantial review, and an entirely new version has accordingly been produced, to ensure the Council's information security is as up to date and robust as possible. The Introduction is expanded to reference evolving threats, interconnections with suppliers and cloud complexity, and the Scope/Responsibilities are tidied (e.g., Senior Information Risk Owner (SIRO) and IT Manager roles retained and employee duties clarified). It subsumes several standalone sections from the previously approved policy (e.g., detailed Information Classification levels, Data Retention, Password Management, Encryption, Physical Security, Third-Party Vendors) into broader controls (e.g., Access Control, IT Software and Equipment, and Incident Response pointing to the Council's procedures). It adds explicit items on acceptable use (linking to Internet and Email Conditions), remote access, third-party system access, software licensing, cloud hosting security, backups, malware monitoring, and fraud-mitigation controls, while simplifying incident reporting to follow the Data Breach and Information Security Incident Procedure. Overall, the new version consolidates guidance, removes granular "how-to" content, and strengthens governance/operational controls, reflecting a cleaner policy-level document with current ownership and publication details.

Information Rights Policy

The policy has been updated to include reference to the Data (Use and Access) Act 2025, including updating the timescale for data subject rights requests being responded to by the Council no later than one month from the date of the request (rather than as soon as possible, as previously). The policy has also been updated to make it clear that Freedom of Information Act requests and Environmental Information Regulations requests must be responded to within the statutory timescales of 20 working days.

Records Management Policy

The policy has been updated to include reference to the Data (Use and Access) Act 2025. Amendments have been made to the Information Asset Owners' roles and responsibilities.

Policies and other considerations, as appropriate	
Council Priorities:	A well-run council.
Policy Considerations:	As detailed within the report.
Safeguarding:	Protecting people's data is considered to be safeguarding our community.
Equalities/Diversity:	N/A.
Customer Impact:	Policies will assist to protect the customer from Information Security incidents.
Economic and Social Impact:	Policies will assist to protect the customer from any negative economic impacts.
Environment, Climate Change and Zero Carbon:	N/A
Consultation/Community/Tenant Engagement:	N/A
Risks:	As part of its Corporate Governance arrangements, the Council must ensure that Risk management is considered and satisfactorily covered in any report put before elected Members for a decision or action. The purpose of this report is to set out the review undertaken by Information Governance Framework authors and detail the changes made. As part of this, the Framework is reviewed annually.
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