GREATER MANCHESTER
DOING THINGS DIFFERENTLY

Senior Information Risk Owner (SIRO) Annual Report 2023/24

July 2024
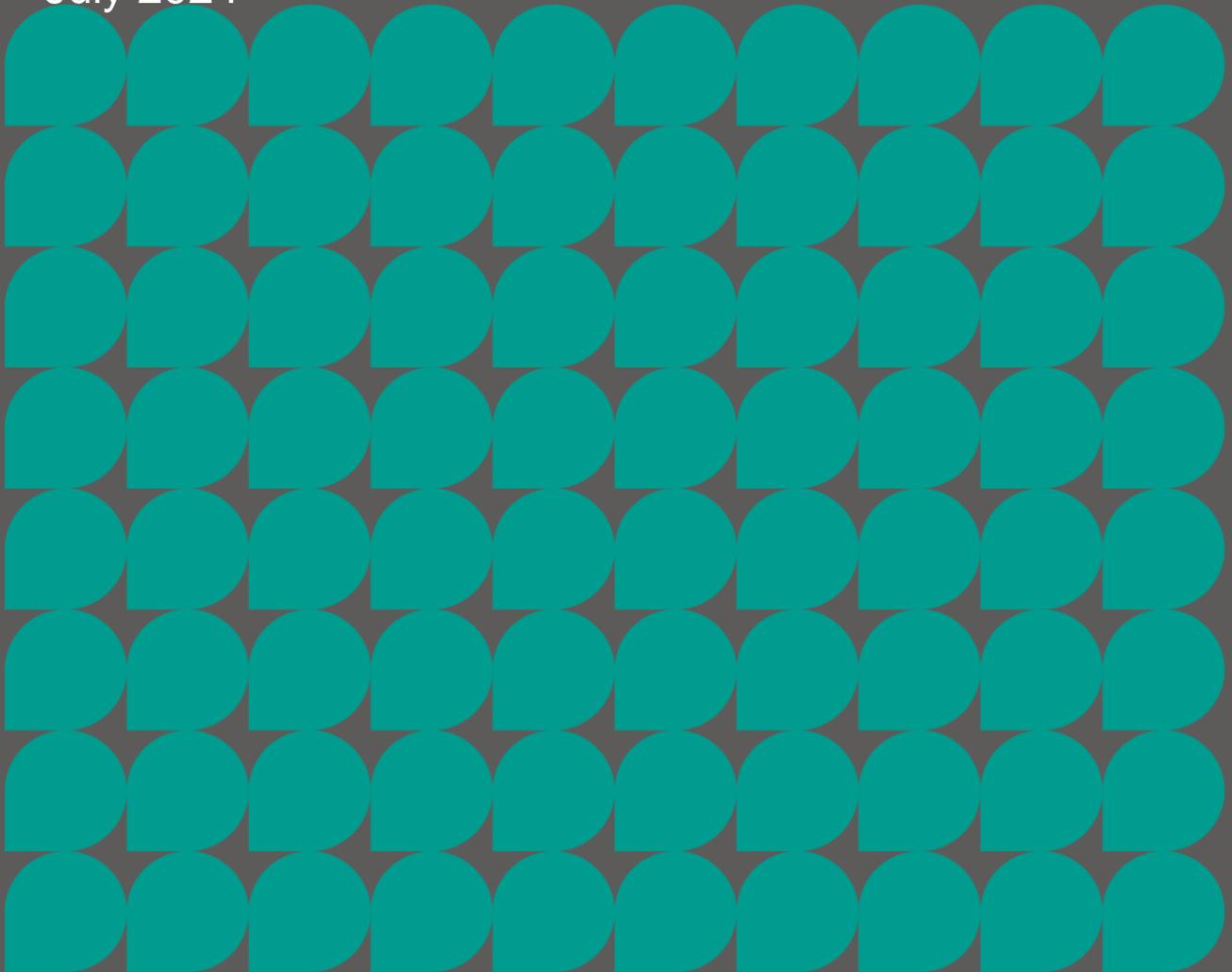
Report to the Audit Committee

Contents

1. Executive Summary

The purpose of this report is to provide an overview of the key information and data governance activities and performance for the 2023/24 financial year. In addition, it aims to provide assurance to the Audit Committee that GMCA remains compliant with its statutory and regulatory obligations.

The GM Information Strategy sets out our vision and ambition for better information management across the Greater Manchester region. Our delivery mechanism to achieve the vision is the GM Information and Data Governance Change Programme.

The second part of this report will provide updates on the activities we have undertaken as a shared Information and Data Governance service across the GMCA and TfGM, and regionally across Greater Manchester to drive forward the strategy and set the standard for good information and data practice.

2. Recommendations

The Audit Committee are asked to note this report and continue to support our delivery and the significant work that has been delivered to drive improvements so that we **Enable**, **Empower** and **Embed** good governance throughout GMCA.

The Audit Committee are asked to agree performance metrics KPIs for implementation in the 2024/25 report. It is recommended that the KPIS are reviewed over the next financial year.

3. Introduction

Information Governance describes the arrangements in place to ensure the effective management, protection and use of an organisation's information assets. This framework is comprised of various policies, practices, roles and responsibilities, developed to assure compliance with legal obligations whilst ensuring information remains reliable, secure and accessible to appropriate users.

The Information and Data Governance Report for the 2023/24 financial year outlines the key activities undertaken by the team on behalf of Greater Manchester

Combined Authority, as a single entity registered with the Information Commissioner's Office (ICO) under reference number Z2751067.

The role of the Committee is to seek assurance that GMCA continues to adhere to the requirements of relevant legislation, guidance and best practice in the context of information and data governance, in recognition of its contribution toward meeting the objectives of the Greater Manchester Information Strategy.

The diagram below illustrates the intrinsic role of information governance in the effective functioning of GMCA's day to day operations, by enhancing the performance of each activity:

Information Governance		
	Business Intelligence	The provision of timely, accurate information.
	Decision making	Access to reliable information to inform strategy.
	Service Delivery	Streamlining processes to encourage continuous improvement
	Business Environment	Compliance to legislation fosters a trustworthy business environment.
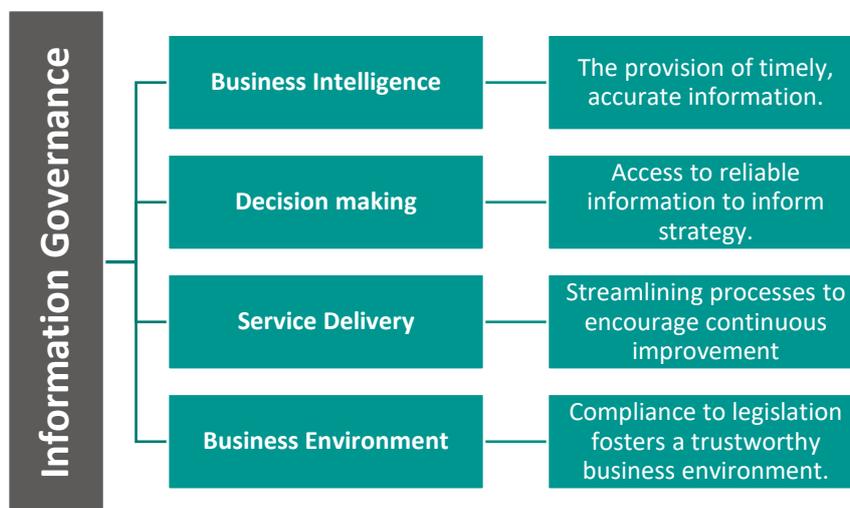
4. Background

Greater Manchester Combined Authority serves a community of 2.8 million people. The ability to deliver the broader objectives of the GM Strategy (GMS) is contingent on the effective implementation of policies, principles and practices to ensure data quality, security and value.

To guide the management of good quality information, enhance service delivery and maintain public trust, GMCA is required to adhere to the principles of several key pieces of UK legislation:

- The UK General Data Protection Regulation (GDPR)

- The Data Protection Act 2018

- The Freedom of Information Act 2000

- The Environmental Information Regulations 2004

- The Privacy and Electronic Communications Regulations 2003, and;

- The Human Rights Act 1998.

In addition to the above, GMCA subscribes to annual submission of the NHS's Data Security and Protection Toolkit (DSPT). This framework sets out the National Data Guardian's data security standards. By providing narrative and documented evidence when completing this self-assessment, GMCA can demonstrate their compliance to these standards – a mandatory requirement for all organisations processing health and social care data.

It should be noted that although GMCA does not routinely process this type of data, its close working relationships with local authorities and health across the Greater Manchester footprint, by way of commissioning and coordinating initiatives to the benefit of GM residents under the trailblazer deal, meeting the standards of the DSPT fosters trust and encourages close participation.

Since its first submission for the 2019/20 publication, GMCA has consistently met the requirements of the 10 National Data Guardian Standards, establishing itself as a stable, transparent and compliant statutory body.

The 10 National Data Guardian Standards

Personal Confidential Data	Unsupported Systems	IT Protection
Staff Responsibilities	Continuity Planning	Accountable Suppliers
Training	Responding to Incidents	
Managing Data Access	Process Reviews	
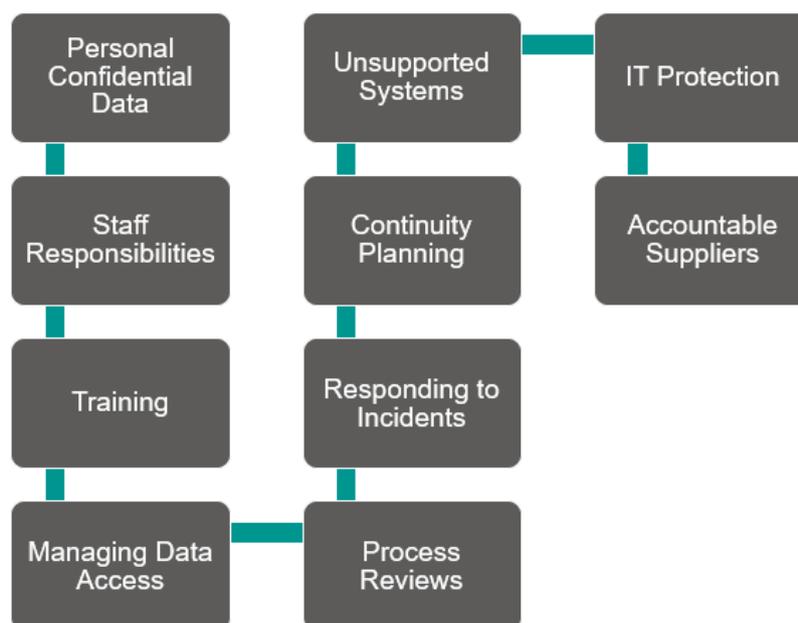
5. Governance Structure

The Information and Data Governance Board

Accountability for the management of organisational information and data assets sits with the Information and Data Governance Board. This forum, chaired by the SIRO, includes representation from Senior Information Asset Owners across all service areas, as well as the Data Protection Officer (DPO), Deputy Director for Audit, Risk and Assurance and Director of Digital.

The principal role of the IDG Board is to provide leadership, support and direction on information and data governance issues across GMCA. Meeting monthly, key stakeholders hold to account the Change Programme workstreams (as detailed in the second section of this report) and identify opportunities for activities to be aligned or connected to the GMCA's ambition of an organisation which fully embeds effective data governance principles and promotes a positive culture around Data Protection and access to information.

The Information Governance Enabling Network – GM

To support the implementation of pan-GM Information Governance initiatives, including information sharing and promote consistent working practices across the regional footprint, the Information Governance Enabling Network (IGEN-GM) has evolved over recent years.

Led by the GMCA and accountable to the GM Chief Legal Officers, as defined through the Heads of Terms for the provision of GM strategic information governance services agreed in November 2021, IGEN-GM principally collaborates to:

- Deliver a shared delivery programme, including exploring GM-wide procurement opportunities;

- Support and inform the development and implementation of the GM Information Strategy; and

- Prepare joint responses to national and local consultations ensuring a GM voice on information governance issues, such as the ICO consultation on generative artificial intelligence and data protection.

6. The Information Governance Framework

The Information Governance Framework is a strategic tool, comprised of policies, procedures and mechanisms that collectively underpins the way in which an organisation manages its data. Developed in accordance with legislative and regulatory requirements, it ensures the safe and effective handling of data and information throughout its lifecycle.

The Framework is applicable to all staff within the organisation and covers the following broad themes:
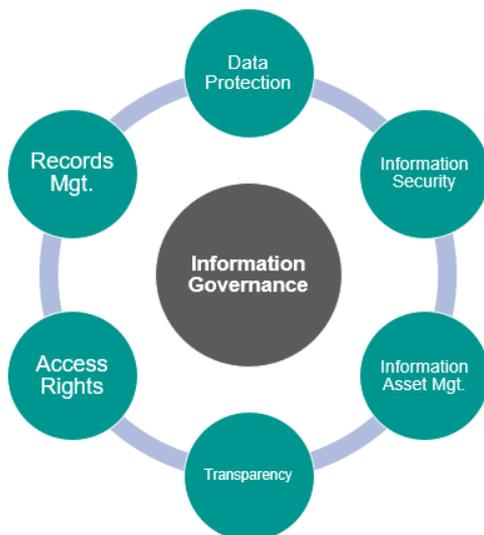
Data Protection: Safeguarding personal data from breaches, misuse and unauthorised access whilst maintaining compliance with legal/regulatory requirements.

Information Security: The mechanisms implemented to ensure the integrity, confidentiality and availability of data whilst preventing disruption to information systems.

Information Asset Management: The systematic process of maintenance, classification and disposal of information assets in recognition of their value.

Transparency: The practice of being open, clear and honest about decisions and operations to foster trust and accountability.

Access Rights: Both the legal rights of individuals conveyed by law and appropriate levels of permissions to systems based on roles and responsibilities.

Records Management: The systematic control of records throughout their lifecycle in accordance with retention policies to ensure they are organised, accessible and appropriately preserved.

Spanning all functional areas, integration of the Framework into day-to-day activities brings together key approaches that underpin the CA's vision to '..***create a better information ecosystem***':

Policy Development – setting clear guidelines and expectations for how information should be used.

Operational Procedures and Ways of Working – promoting consistency and compliance through actionable steps.

Collaboration and Coordination – establishing informal groups, engaging with external stakeholders and fostering communication between service areas.

Technology and Tools – leveraging technological solutions to enhance security, data management and information sharing initiatives.

Compliance and Monitoring – the critical elements of information and data governance. Activities include; audits and assessments, effective risk management and performance monitoring.

7. The Information & Data Governance Team

As a shared service with Transport for Greater Manchester, whilst committed to both acting in accordance the data protection legislation and meeting statutory obligations, we additionally recognise the evolving data landscape across the Greater Manchester footprint. As such we strive to support the ambitions of all three organisations to utilise data, not limited to solely personal data, in an efficient, ethical and enabling manner. To this end, the title of the service area has evolved to Information **and Data** Governance.

Our aim is to **Enable**, **Empower** and **Embed** good governance from the start so that colleagues across GMCA can safely, securely and lawfully use data and information to ensure that effective and informed decisions can be made at an operational, tactical and strategic level.   To support overall activities across GMCA the Information Governance board has also refreshed its Terms of Reference and is now

also known as the Information and Data Governance Board, reflecting an enhanced focus on a key organisational asset, that being data.

Additional changes to the functional area include the development of a Business Partnering Model. Unlike more traditional models, IDG Business Partnering is designed to improve the effectiveness and quality of decisions that impact organisational delivery, by virtue of a designated Senior Information and Data Governance Lead who engages more closely with appropriate decision-makers to understand their directorate or service area needs, identify priorities and enhance compliance. Whilst still in the implementation phase, with 90% of introductory meetings having already taken place, the true benefits of this model are expected to be yielded over the course of the current financial year and appropriately reported in the 2024/25 iteration of this report.

8. Performance Metrics

During 2023/24, GMCA continues to effectively manage its responsibilities in relation to information and data governance (IDG) practices within the context of an increasingly challenging landscape. Improvements implemented as a result of the activities of the change programme over prior and current years continue to demonstrate their effectiveness by enabling the team to achieve broadly consistent outcomes in relation to performance despite the impact of external factors, such as the launch of Bus Franchising, new ways of working, and more complex data flows to and from GMCA to support service delivery.

The Audit Committee are requested to note that all figures stated are as reported at a fixed point in time to the GMCA's Information and Data Governance Board and are as such subject to change after that board has met, following subsequent completion of individual requests.

9. Subject Access Requests

In accordance with the UK GDPR, data subjects (living individuals) have the right to request copies or access to the personal data about them processed by any organisation. The statutory timeframe for completion of these requests is one calendar month (30 days), however, in specific circumstances this may be extended by a further two months, allowing a total response time of 90 days.

During 2023/24, GMCA received a total of 22 Subject Access Requests, a decrease from the 30 requests received during the previous financial year. However, these requests were submitted sporadically during the period, in comparison to a more even distribution in 2022/23. With consideration to the statutory deadlines, this resulted in increased pressure on the IDG Team's capacity in order to prioritise harvesting the information and responding accordingly, whilst continuing to deliver core activities as a support service.

Total Number of SARs Received – 22/23 vs 23/24
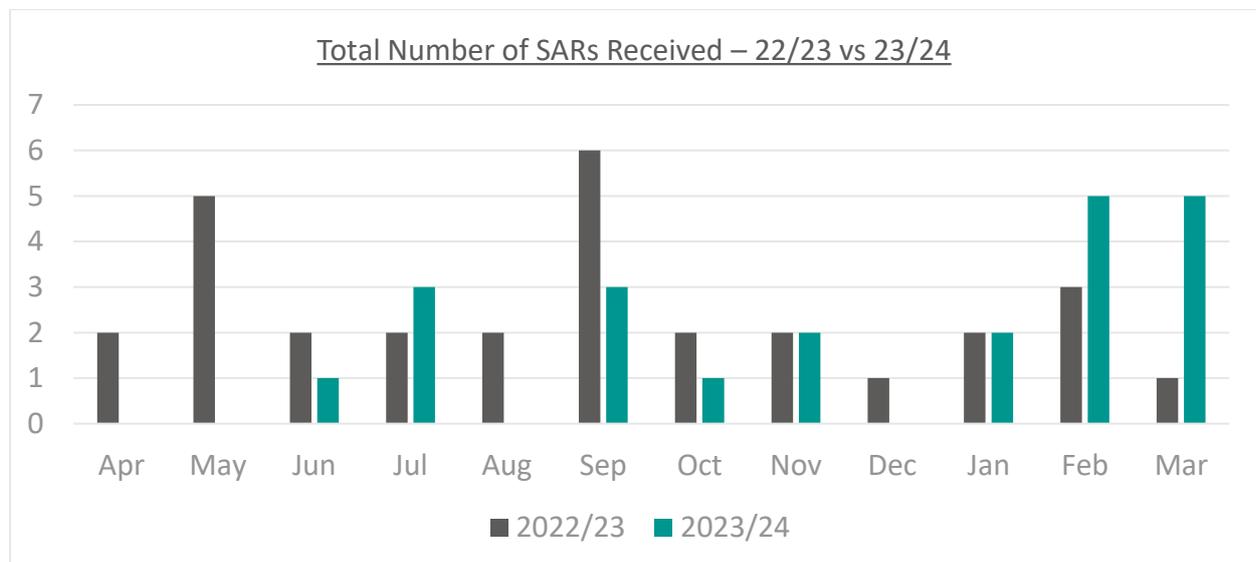
Of the 22 requests received, 18 (82%) were responded to within the statutory timeframe. In comparison of the 30 requests received in 2022/23, 26 (87%) were responded to within the statutory timeframe.

No complaints were referred to the ICO in relation to Subject Access Requests in 2023/24, whilst a single case was escalated to the Regulator during 2022/23.

Percentage of SARs Responded to Within 1 Month – 2022/23 vs 2023/24
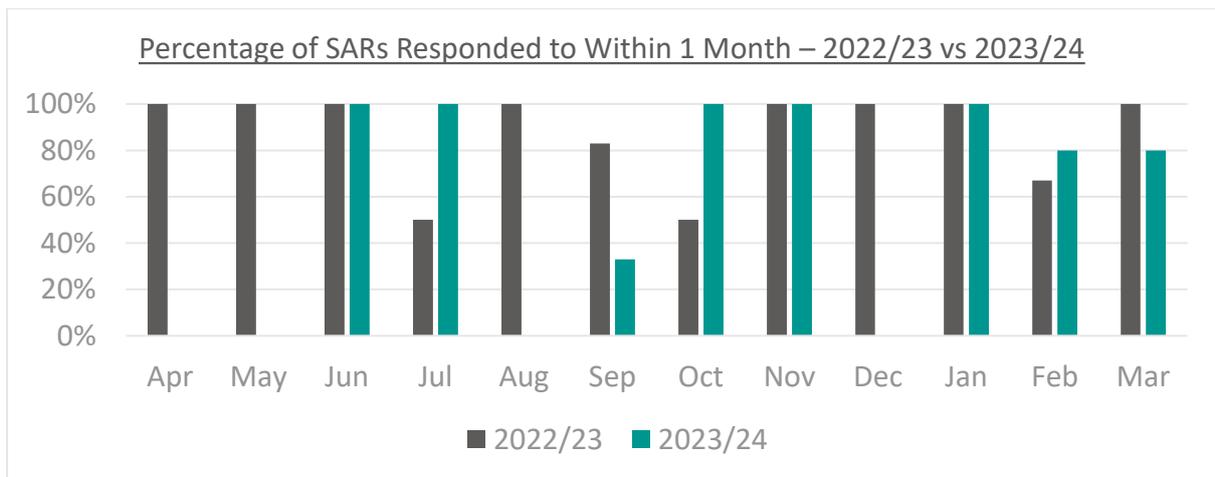
10. Freedom of Information Requests

In accordance with the Freedom of Information Act (FOIA) 2000 and Environmental Information Regulation (EIR) 2004, GMCA, as a public body, are required to respond to requests from the public within 20 working days to promote transparency and support democratic principles. Furthermore, the ICO, in its responsibility to monitor compliance and set performance standards, has set an expectation that public authorities respond to at least 95% of FOI and EIR requests within the statutory time frame.

Between April 2023 and March 2024, GMCA successfully met the expected response rate of 95% (231) of requests on time, an improvement from 92% (188) during 2022/23. For GMFRS (Greater Manchester Fire & Rescue Service), on-time completion rates were slightly better at 96% (108) and 92% (86) respectively.

With consideration to the continuing demands on resources within the IDG Team, as is demonstrated in the graph below with reducing month-on-month completion rates from December 2023, work is ongoing to streamline processes with improved use of the case management system, enhancement of existing publication schemes and to be further complemented by the new business partnering model.

Total FOI/EIR % Completion Rates – 2023/24
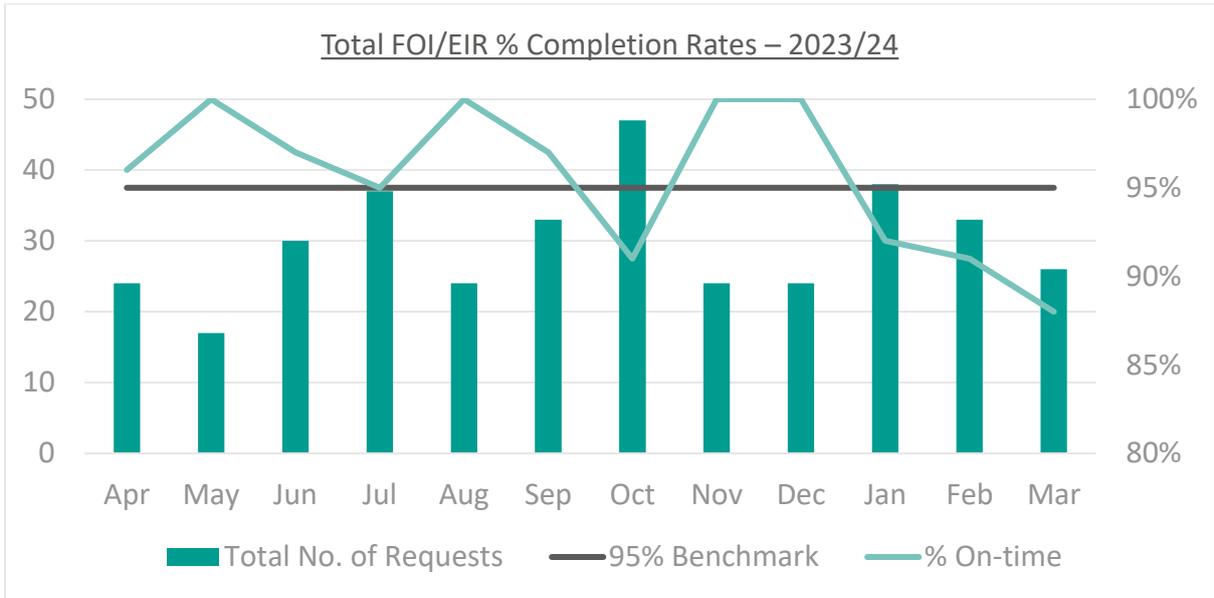
We have seen a 20% increase in total requests, from 297 in 2022/23 to 357 during 2023/24. The chart below illustrates the consistent increase in requests, when compared to the same months of the previous financial year, the distinct exceptions being September and November for unknown reasons. Performance in this area is monitored by the Information and Data Governance board where measures are put into place to ensure performance remains consistent to the benchmark of 95%.

Total Number of FOIs/EIRs Received – 2022/23 vs 2023/24
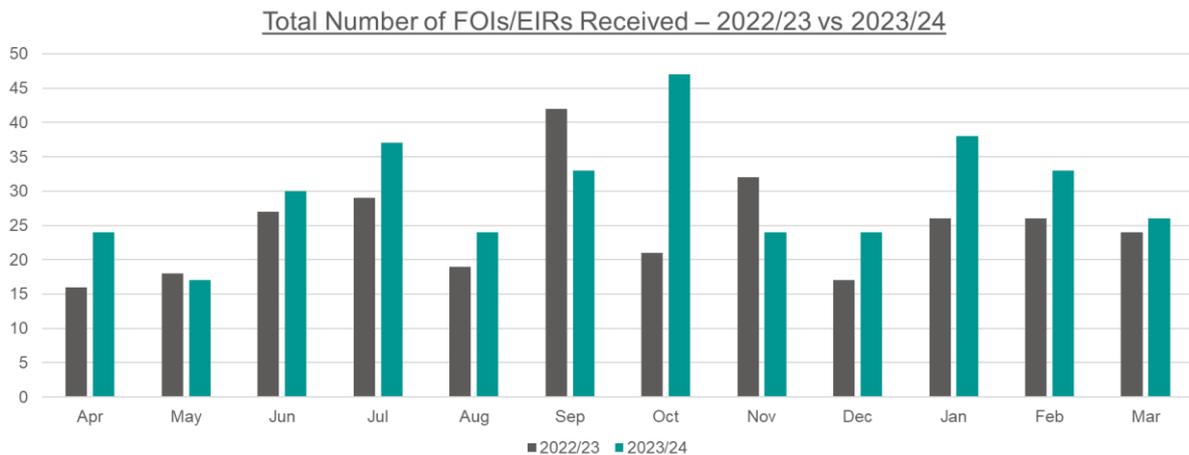
The charts below illustrate the proportion of FOIs/EIRs received between GMCA and GMFRS during 2022/23 and 2023/24:
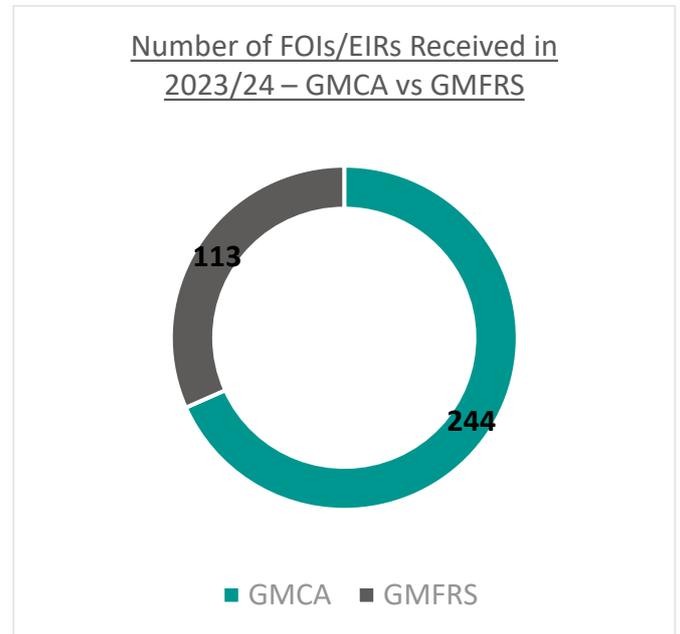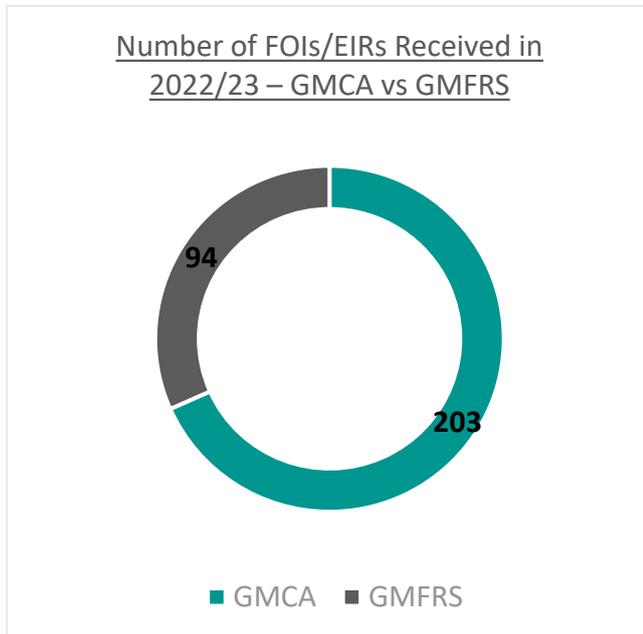
For two consecutive financial years, approximately 45% of all FOI/EIR requests were in relation to information from GMFRS. Of the total requests processed during 2023/24, approximately 3% (10) were challenged via the internal review process, a small increase from 2% (5) in 2022/23. Of the 10 internal reviews requested, the following outcomes were attained:

- 2 Upheld

- 5 Not Upheld

- 3 Partially Upheld.

In the latter two scenarios, further information was provided to the requestor and the case closed.

A single FOI complaint was escalated during June 2023. This related to a request for email correspondence between the GMCA and a senior member of government. Whilst the outcome of our internal review maintained that some information harvested should not be disclosed, following escalation to the First Tier Tribunal, it

was determined that a portion of the information should be released, resulting in a partial disclosure.

No complaints were received from the ICO in relation to FOI/EIR requests during 2022/23.

11. Information Security Incidents and Personal Data Breaches

GMCA Data Security Incidents – 22/23 vs 23/24

GMFRS Data Security Incidents 22/23 vs 23/24
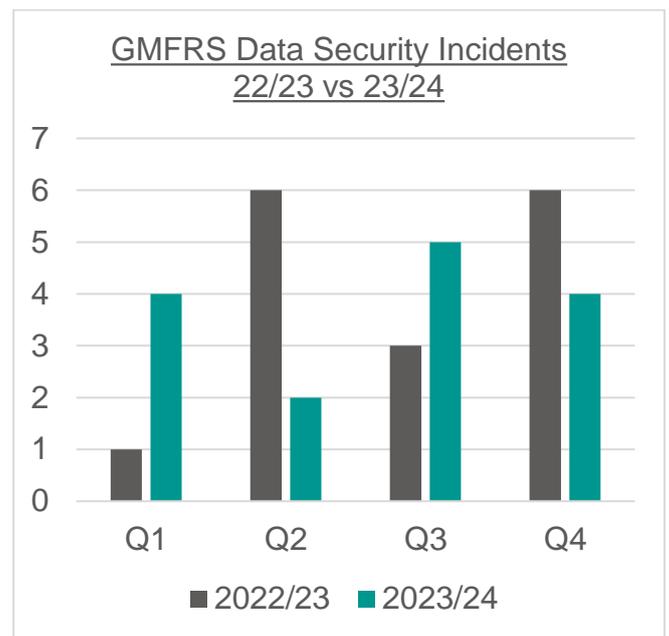
During 2023/24, there have been a total of 46 incidents reported to the Information and Data Governance Team, in comparison to 44 over the previous year. Of these 46, 33% (15) originated from GMFRS, with a similar proportion of 36% (16) during 2022/23.

The IDG Team categorises incidents in line with the UK regulators practices. For GMCA as a whole, the most common category of incident reported is 'non-cyber - data emailed to incorrect recipient' with 15 occurrences (32%) in comparison to the previous year's 43% (19 of 44). This category of incident is just under twice that reported nationally by the Information Commissioner's Office in their annual report of 2022/23. The ICO details that on average 18% of all reported incidents are 'non cyber – data emailed to the incorrect recipient'.

The table below illustrates the categories of incidents reported to the IDG Team during the 2023/24 financial year:

Types of Data Security Incidents by ICO Categories 2023/24

Category	Count
Verbal disclosure	1
Other non-cyber incident	8
Data left in insecure location	1
Loss/theft of device	3
Incorrect user selected in portal	3
Incorrect disposal/handling of paperwork	2
Failure to use bcc	5
Failure to redact	1
Data posted/texted to incorrect recipient	4
Data emailed to incorrect recipient	15
Cyber - Phishing	2
Cyber - Other	1

Actions have been taken to increase staff awareness of how to spot an incident and to highlight steps to be taken to ensure that emails are sent securely and or to the right recipient. Bespoke training has been delivered in previous years by the IDG team. This will be revisited in the context of business partnering to further enhance directorates' safeguarding of personal data.

12. Serious Information Governance Incident (SIGI) Panel

To support the work of the Information and Data Governance Board in ensuring the organisation's data and cyber security remains uncompromised, the Serious Information Governance Incident (SIGI) Panel acts as a forum to review and discuss incidents assessed as meeting a prescribed threshold. Chaired by the Senior Information Risk Owner and attended by Information Asset Owners, the Panel meets monthly, as appropriate, to provide assurance via in-depth analysis of incidents; suggestions and monitoring of actions arising from investigations; and determining whether notification to data subjects is appropriate, on a case-by-case basis. Where identified, any organisational recommendations that require organisational change

are referred to the Information and Data Governance Board to provide accountability and manage progress.

13. Training and Awareness

While it remains paramount that organisations adhere to regulatory and legal compliance requirements, organisations are made up of people. Therefore, it is the responsibility of each individual to ensure they understand their role and contribution to the safe and effective management of information flows within GMCA.

Training and awareness campaigns are a key contributor to our positive data culture and shared understanding of the organisation's information needs and responsibilities.

The table below illustrates mandatory Annual Cyber Ninja training compliance completion rates for each directorate, as of 31st March 2024. Mandatory Annual Cyber Ninja training compliance continues to be the main drive for staff awareness and completion rates are continually monitored by the IDG board. Overall, organisationally the completion rate for GMCA including GMFRS is 75%.

Training Compliance – March 2024

The GMCA Information and Data Governance (IDG) Board proposed to (Senior Leadership Team) in December 2023 that progression of the IDG training framework was needed with the launch of a Level 2 IDG course to compliment the level 1 Cyber Ninjas and ensure staff were supported to discharge their responsibilities in this area.

A pilot approach was launched mandating level 2 for all Band 8 and above staff, alongside GMFRS uniformed staff that are Station Managers, Group Managers, Area Managers and Principal Officers. Approximately 600 staff members.

This was launched in Mi Learning from January 2024 with promotional activity scheduled for this course alongside further compliance reminders with the IDG Board considering appropriate next steps to improve this course completion rate. Completion rates for this enhanced training module will be presented in the 2024/25 iteration of this report.

14. Requests for Support

The IDG service is receiving an increasing number of requests for support by Functional Areas on individual project/programmes which include uses of information and data. This highlights that the IDG service and related processes are embedding and maturing in the organisation. A total of 204 requests have been submitted to the IDG team this financial year, a 32% increase (50 additional requests) from 2022/23. With the implementation of business partnering, we await to see whether this figure will continue to rise as the visibility of the IDG team increases as it embeds; or whether as the organisation shifts to a more self-serve capability on low-risk activities as directorates evolve to become more empowered, we will see a reduction in requests for support.

15. Risk Management

Risk management provides a strategic and consistent approach to identification and assessment of risks and opportunities that have the potential to impact GMCA's information and data governance environment.

The mechanism of IDG assurance is illustrated in the diagram below, integrating policy development, risk management, compliance and strategic oversight:
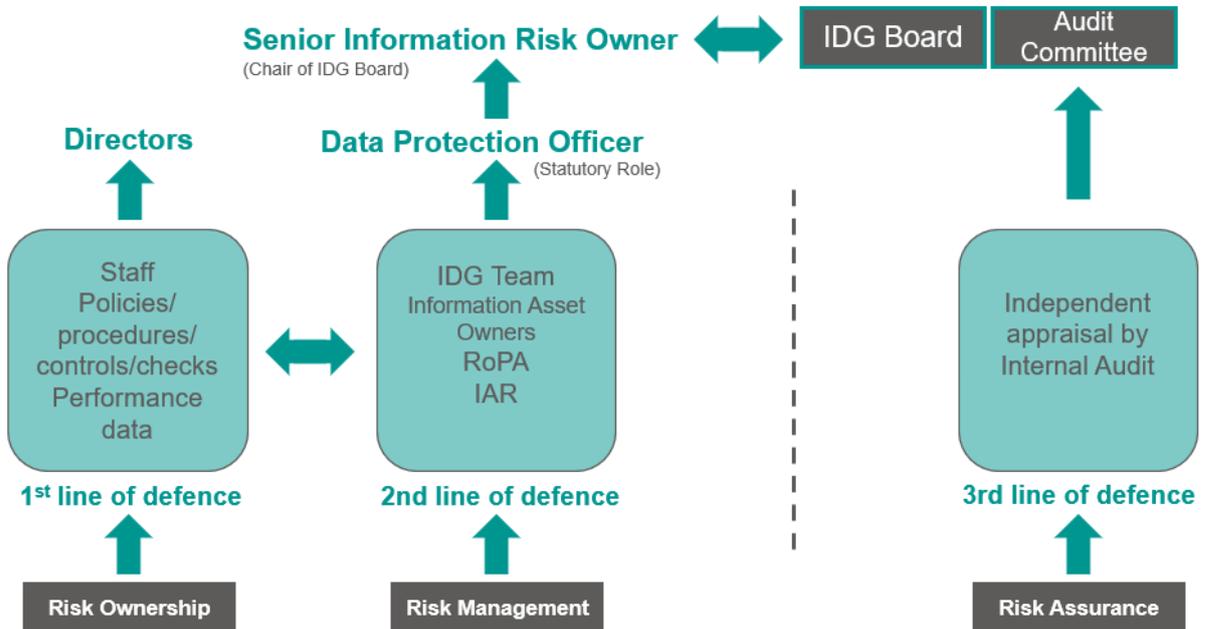
The IDG Board are tasked with the responsibility to scrutinise the management, mitigation and control of associated risks.

As of 31 March 2024, thirteen (13) risks were recorded on the IDG Risk Register. The heat maps below illustrate the residual scoring of these risks against target score:

Residual Risk Score

LIKELIHOOD			1	2	3	4	5
Very High	5						
High	4					2	1
Medium	3					4	
Low	2			1	1	3	1
Very Low	1						
			Very Low	Low	Med	High	Very High
			IMPACT				

Target Risk Score

LIKELIHOOD			1	2	3	4	5
Very High	5						
High	4						
Medium	3						1
Low	2				1	7	1
Very Low	1				1	2	
			Very Low	Low	Med	High	Very High
			IMPACT				

As a direct result of the current international climate of increasingly sophisticated terrorist threats, coupled with hostile nation states, it is unsurprising that the prevailing risk is: '*Cyber-attack leads to the loss or corruption of sensitive data*',

with a likelihood of four (4) and impact of five (5), resulting in a residual risk score of 20,of a maximum 25.

Were this risk to crystallise, the potential consequences include the loss or corruption of sensitive data leading to reputational damage, financial and legal sanctions, in addition to potential massive disruption to organisational activities.

Existing mitigations include;

- Close working of the SIRO, DPO, Deputy Director Risk and Assurance, Corporate Risk Manager and Director of Digital to articulate risk to the wider organisation

- Maintain, fund and deliver an IS security programme which broadly captures activities within scope, aligning them to known risks

- Monthly reporting and analysis to IDG Board and SIGI Panel

- Annual mandatory eLearning

- Phishing software (Boxphish) email simulations and regular reporting of user susceptibility.

    A number of further activities have been identified and assigned to action owners to further treat this risk until it can be reduced to within the organisation's risk appetite score of fifteen (15) or below.

Additional risks with an amber residual score (12-16) are recorded below:

Risk	Existing Controls	Residual Score	Target Score
Uncoordinated and unacceptable use of Artificial Intelligence	Acceptable Use Policy / Monitoring use of AI / Aligning with best practice	16	8
Managing the inflow and outflow of complex and sensitive datasets	Data processing arrangements in place / Data Sharing Policy / Knowledge of sensitive datasets	16	8
Information Asset Management	Project, programme and BAU activity data is recorded in Information Asset Registers	16	8

16. The GM Information Strategy

The GM Information Strategy sets out of shared vision for better information and data management across the GM eco-system. The strategy was signed off by the GMCA in January 2022 and as a three-year strategy, will be refreshed from January 2025.

The vision of the GM Information Strategy:

> We will create a better information ecosystem that realises the full potential of information; manages, shares, and uses information responsibly; helps to tackle our most serious challenges; and supports Greater Manchester's wider ambitions.

To achieve to vision and missions of the strategy there are various activities taking place both organisationally and regionally. The GMCA Information Governance Change Programme is the delivery mechanism to co-ordinate, manage and resource these activities. The change programme has two main areas of focus:

1. GM regional projects under the GM Information Strategy delivery plan

2. GMCA and TfGM organisational change projects.

17. The Information Governance Change Programme – GMCA and TfGM Organisational Change Project Updates

As a shared service across the GMCA and TfGM we are committed to improving the way we manage, utilise and value information and data across these organisations. This activity is governed by the GMCA Information and Data Governance Board and the TfGM Information and Data Governance Board. As a change delivery function,

the programme is responsive to the needs of the organisation and we have adopted Lewin's Change Model of unfreeze – change – refreeze. This model recognises the core activity of the team is business as usual which operates in the freeze state. When we need to improve an area of work, we frame this as unfreezing it from BAU activity, conducting the change activity, and then refreezing that activity in BAU in its new state.
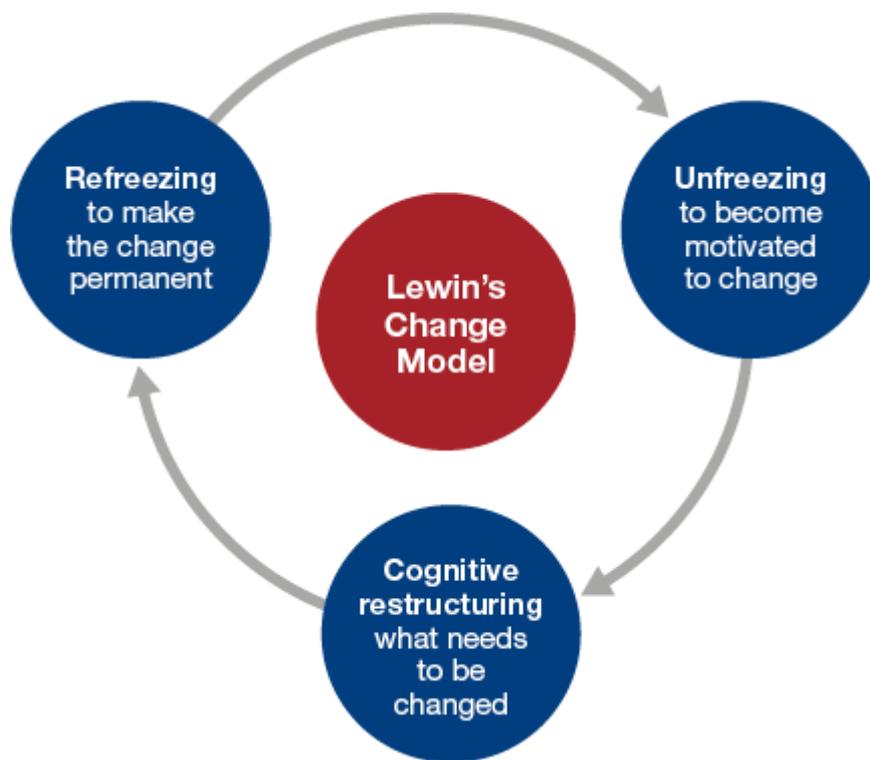
As a change delivery function we are moving to a more agile way of working with a key focus on delivery.

We are keen to support the GMCA Next Phase work around Policy and Delivery and change management is fundamental to achieving the objectives of the GM Information Strategy. We have engaged with this workstream area, and the IG Change Programme has been used as a test bed for the development of the policy and delivery framework.

The following sections details the key organisational change activity undertaken over the past year and the expected work over the coming year.

18. Information Asset Management (IAM)

The first phase of the IAM project concluded in summer 2023 and a second phase of the project was then launched. The first phase of the project deployed a service area-led model for information and data asset management across the shared service. This included:

- The creation of the information asset register and register of processing activities in SharePoint.

- Delivering training to Information Asset Owners and Administrators.

- Conducting an extensive communications and engagement plan across the organisations.

- Establishing the Information Asset Owner and Administrator network.

The second phase of the project aimed to build on the successes of the first phases to enable, empower and embed the change into the organisation. The aims of the second phase are:

- Enable the delivery of a wider information and data governance framework approach.

- Empower functional areas and teams with the knowledge, tools, and ongoing support to manage their information and data assets effectively.

- Embed long term sustained culture and behaviour change to how information and data assets are managed.

During the first phase of the project, training was provided to Information Asset Owners (IAO) and Administrators (IAA). This training was recorded and is now hosted on the Learning Management System (LMS) for any new IAO's and IAA's however we recognise that it is not a fit for purpose long term training offering. In response to this, we are currently developing a bespoke IAO and IAA training module which will be supported by the Data Confident training module referenced later in the report.

The training module is being designed and built in collaboration with our learning and development team. It is aimed to be delivered by quarter three of 2024/25.

IAM Community

The IAM community of practice, hosted via Microsoft Teams remains our primary means of communication with IAO's and IAA's. We regularly provide updates to the community, and it is monitored by the shared service for any questions or queries.

TfGM IAM Audit

An audit of TfGM's IAM maturity was conducted in the spring of 2023. Whilst this was a TfGM audit, as a shared service the GMCA Information and Data Governance Board agreed that the recommendations should be equally applied to the GMCA as well as TfGM.

The audit found that phase one of the IAM project had delivered the registers and processes to enable information asset management. The next step was for IAO's and IAA's to start to utilise these registers.

Working with the audit team an initial deadline was set for IAO's and IAA's to update the registers. In response to the deadline we did see a significant increase in assets being added to the registers however we know that this remains an on-going activity for the organisation to ensure the registers are kept up to date.

We continue to support the organisation in meeting the recommendations of the audit and are working closely with the audit team on these.

IAM Insights

A major benefit of the IAM project are the insights that can be gained from having up to date registers. Using PowerBI, we have developed dashboard views of the registers and presented these to the Information & Data Governance Board. This will be key to the organisation deriving business useful information from the data entered which will aid areas such as business continuity.

As part of this work, we have engaged with Research and Digital colleagues. Out of this there is an informal network/working group looking at the use of PowerBi in

different instances across the organisation. This is an example of our commitment to collaborative working across service areas.

19. Information Rights

A key success of the past year has been the delivery of the Information Rights project which is now complete.

The objectives of this project were to improve and standardise the processes and procedures supporting how information requests are handled, foster the organisations towards an increased culture of transparency and openness, increase the amount and quality of datasets and information made available to the public and establish a new way of engaging with those that own published data or deal with information rights requests, so that guidance and support can be provided to them.

Significant deliverables completed are:

- A revised FOI/EIR e-learning course has been made available to all staff via MiLearning.

- The gap analysis for the updates required to the publication scheme for TfGM, GMCA, GMFRS and PCC has been completed and work is progressed to update content and the way this is structured on the websites, to make this more easily accessible to the public.

- An updated Public Interest Test checklist and guidance for staff

- A Quality Assurance internal procedure to be carried out quarterly within the IDG team will review a selection of information request responses from the previous quarter.

- The FOI, EIR and Transparency User Group has been relaunched and will meet quarterly to discuss key issues/challenges/opportunities around information rights.

20. GMCA and TfGM iCasework Breach Module

To improve the way we manage security incidents we are planning on procuring the iCasework breach module. This will help bring efficiencies to the process and better insights through reporting. This will help to better support the Serious Information Governance Incident (SIGI) panels in both organisations.

Contracts and Procurement

We have initiated a project which is seeking to improve the way we as a shared service support procurement and contract activities across the organisation. The scope of the project is as follows:

- Mapping the Process with procurement colleagues across GMCA and TfGM, to identify current opportunities for efficiencies and collaborate on wider process development for effective Information & Data Governance (IDG) involvement.

- Revised tools and guidance for the IDG team to ensure a consistent response to procurement is in place.

- Training plan to develop clear guidance materials for the IDG team to facilitate consistent responses from across the team into procurement and contract Requests for Support (RfS).

- Education and awareness raising with a range of clear messages for stakeholders across organisations regarding IDG role and support offer to promote timely and consistent engagement of the service and others involved. These will be aligned to the wider Contract Management Project as it progresses and utilise the Champions networks.

- Compliance monitoring guidance will be considered in the mapping of processes with a view to offering input to the wider Contract Management Project Dashboard and framework as it progresses. For example, to ensure due diligence in contract monitoring is consistent and clear for contract managers around areas such as TIA's and processor reporting duties.

This project will work in collaboration with Legal, Procurement and Digital colleagues across both GMCA and TfGM to identify where we can embed the appropriate information and data considerations into the procurement process.

21. Information and Records Management Project

The Information and Records Management project will look at the way we as an organisation manages our records and build on both the outputs of the Information Rights and Information Asset Management projects. The scope of the project is to:

- Establish and embed an approach to records classification and handling across GMCA and TfGM supported by appropriate tools, guidance and policies.

- Improving, defining and embedding our retention schedules across GMCA and TfGM, supported by clear guidance and policies, and applied using records management technologies.

- The production of robust records management guidance to support teams and individuals across the organisations to learn and apply best practice.

- Enhancing our Information Management approaches (document management) by better utilising records management tools within SharePoint and establishing guidance for information & data quality audits to eliminate duplications and copies on other drives.

- Developing an approach and strategy for better record access and visibility that considers the needs for different levels of access for internal and third-party users depending on record classification, as well as records stored in third party systems.

- Understanding the current state of play regarding paper records, the contracted supplier(s) for this and the current usage. The project will look to improve this area and where possible enable the organisation to address paper records which are beyond the retention period.

One of the priority areas for the project will be to run a pilot of information classification and data loss prevention utilising the Microsoft suite of features.

22. Cyber Ninjas and Data Confident E-Learning

Cyber Ninjas remains as our e-learning course of choice and to complement this offering and further bolster our workforce, we have procured the Data Confident e-learning training course. Supported by the Senior Leadership Team (SLT), we have initially rolled this out to grade 8 members of staff and above, and equivalent across GMFRS. So far, feedback has been positive, and we will be recommending this training be made mandatory for all staff across the entire organisation. This is the approach TfGM have adopted.

Some quotes Data Confident are:

"How to process data and how to keep data secure, storing for the correct purpose. Important to ensure we are compliant with data regulations."

ESW

"Helps you understand more about the different types of personal information"

ESW

"The e-learning went into a great amount of detail . I found myself re watching many of the videos."

Environment

23. The Information Governance Change Programme – GM Information Strategy Delivery Plan Priority Areas

The GM Information Strategy delivery plan is focussed on the GM delivery of the strategy. The six priority areas for the coming year are:

- Better Use of Data (Continued from 2023/24)

- Data Ethics (Continued from 2023/24)

- Strengthening Governance (Continued from 2023/24)

- Community Engagement (Continued from 2023/24)

- Data Sharing Framework (Continued from 2023/24)

- Artificial Intelligence (AI) (New for 2024/25)

24. The GM Information Board

Board Champion – Cllr and Leader Nick Peel – Bolton Council

Chair – Alison McKenzie-Folan – Chief Executive - Wigan Council

Deputy Chair – Roger Prudham – Deputy Medical Director and Caldicott Guardian – Northern Care Alliance

The GM Information Board provides strategic leadership in information and data governance. It provides direction to the GM Information Strategy delivery plan. It remains as our primary vehicle for delivering system change across the Greater Manchester information and data eco-system.

The board has been in place since 2019 and over the past five years has grown, developed, and matured. It is a valued mechanism for bringing together strategic partners in the field of data and information. Like all boards, as it has matured it also benefits from periodic reviews. Activity has taken place over the past year and

continues through 2024/25 to refresh the membership of the board and the terms of reference to ensure it continues to meet its strategic aims.

25. The Information Governance Change Programme – GM Information Strategy Delivery Plan Projects

2023/24 was the first year that the GM Information Strategy had specific budget allocated from Business Rates. Significant planning activity, baselining and positioning took place throughout the year that has allowed us to accelerate delivery through 2024/25. Alongside this work, key deliverables from the last financial year include:

- Delivery of the funded Citizen Led Security Standards Phase 1 project.

- Delivery of the funded work to develop community engagement principles when using automated decision-making technologies.

- Kick-off and delivery of a GM Information Sharing Framework workshop

- Applications to two Knowledge Transfer Partnerships and the Open Government Partnership

- Delivery of a plain English version of the GM Information Strategy

- Ongoing support of the GM Analyst Network

2024/25 activity is planned to take place under each of the priority areas and at the appropriate times, the GMCA and TfGM Information & Data Governance Boards will be updated on the progress of relevant projects. Some of the significant projects being delivered under each priority area are:

26. Better Use of Data

The public, private, and third sectors in Greater Manchester hold a wide variety of information – both personal data and non-personal.

Better approaches to using this data, especially in opening more information up for use, can help to do new and innovative things that support the people, communities, and businesses of Greater Manchester

- An open data policy for GMCA/TfGM and for GM organisations.

- Exploration of a data maturity assessment for GM.

- Sponsorship of the Open Data Camp event in July 2024.

27. Data Ethics

It is increasingly important to ensure that data ethics is embedded within the work of our information ecosystem. This is critical to maintaining and fostering trust; supports responsible use of information; and enables stronger governance. Embedding data ethics requires the right skills, behaviours, tools, infrastructure and information management processes to work correctly, and to allow data users to do the right things with information.

- Promotion of the Open Data Manchester designed Declaration for Responsible and Intelligent Data Practice across Greater Manchester.

- An approach to citizen engagement around data and information which will explore surveys and participation groups.

- Considering the Open Government Partnership and committing to a project that demonstrates co-production both on a multi-agency basis and with members of the public.

- Plain English version of info/data rights documents

28. Strengthening Governance

Information policy has long been an area with limited scope for work at a local level. However, with the new Devolution Trailblazer, and with increasing use of new technology and large datasets to support local activity, strong and reliable governance becomes ever more important.

Ensuring this governance has the right oversight, and the right membership, is critical to providing a balanced and inclusive approach to information policy in Greater Manchester.

Some of the activities we have undertaken or plan to undertake are:

- An event to bring together Senior Information Risk Owners (SIROs) from across GM to work through a serious incident scenario.

- A refresh and strategic improvement to the governance of the Greater Manchester Information Board.

- A refresh of our communications and engagement plans which is vital in building trust with residents across GM.

- Continue to support GM Data Partnerships around Data Devolution.

- Support the Information Governance Enabling Network – Greater Manchester (IGEN-GM) and the delivery of an annual work plan for the group.

- Development of a funding model that allows community organisations and public sector organisations to bid for funding for projects that align to the delivery of the GM Information Strategy vision and missions.

29. Community Engagement

Closely linked with elements of accessibility, communication, and inclusivity, focusing on better communication and engagement can help us to form a basis of good relationships and trust within communities in Greater Manchester.

- A sponsored project with Noisy Cricket to consider how the citizen voice can be built into data sharing practice.

- Promotion of a set of principles developed through a sponsored project with Open Data Manchester to engage with members of the public around automated decision-making technologies.

30. Information Sharing Framework

The sharing of data and information remains one the greatest challenges facing the city region as devolution enhances and the reliance of data becomes even more

significance. Taking a strategic, GM led approach to information sharing will enable better collaborative working and unlock deeper insights into the work we are doing.

- A significant project to deliver a Greater Manchester Information Sharing Framework to better enable information sharing and the governance between organisations.

- A Knowledge Transfer Partnership with Salford University to deliver a regional change management approach to embed the information sharing framework.

31. Artificial Intelligence (AI)

AI is already prevalent across society and influences the way we conduct much of our daily business. Future proofing our organisations for the developments in this space and considering the ethical and other implications of AI are a key priority.

- A Knowledge Transfer Partnership with Manchester Met University to develop a model for assessing AI technologies.

Overall our change management programme will continue to ensure that we **Enable**, **Empower** and **Embed** good governance throughout GMCA.