6.   DIGITAL PROGRAMME 2018/19 including overview of GDPR preparations

REPORT OF: HEAD OF DIGITAL AND CUSTOMER SERVICES
Contact Officer: Simon Hughes, Head of Digital and Customer Services
               Email: simon.hughes@midsussex.gov.uk Tel: 01444 477421
Wards Affected: *All*
Key Decision: No
Report to:

               Scrutiny Committee for Customer Services and Service Delivery

               13th February 2018

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Purpose of Report

1. This report provides Members with a progress report on the service design and digital programme endorsed by the Scrutiny Committee for Customer Services and Service Delivery on the 8th February 2017. It includes more detail on the priorities for the coming twelve to eighteen months and covers details on the Council's preparations for GDPR.

Summary

2. Digital in its widest sense refers to an approach to change which is often, but not always, enabled by digital and networked technologies. This change is both social (culture and behaviours) for example the increasing use of mobile devices, as well as technical (process design and infrastructure) for example software that is internet based not needing such complex hardware on site (Software as a Service)

3. Digital is not the point of the change, but it can drive changes and support changes within services. For example, information on bin missed bins can be transferred from the contact centre to SERCO in real time so that they can be picked up more quickly therefore improving customer services. This reduces staff time spent on processing information and more time on delivering the service.

4. While there have service improvements the programme has also identified efficiency gains and areas where costs have been avoided over the coming months and years. The fall into three areas: efficiency gains, cost reduction and cost avoidance. Many of the changes to date have been used to increased capacity within services and update hardware and software to support changes in how services can be provided to meet changing business needs. For example,

Recommendations

5. The Committee is recommended to:

    a) Note the progress of the service design and digital programme in the past year;

    b) Consider the outline approach for the service design and digital programme for 2018/19; and

    c) Consider any particular priorities that they would wish to see given within the service design and digital programme.

Background

Digital and technology trends in the last year

6. The past year has seen a continuation of the move of technology towards internet based, mobile accessible tools and systems. A good example of this shift is Microsoft, a company that once based its strategy on its Windows operating system, which dominated desktop and laptop computing. Microsoft is now taking a cloud services approach, wanting customers to use its applications on a whole range of devices, including those based on Google and Apple technology.

7. This is changing the software supplier market to government, with the expectations of both staff and citizens using online services demanding an experience similar to that which they get using consumer services such as Facebook, Amazon, Google and so on. Increasing pressure is being put on our suppliers to deliver software that is easy to use, straightforward to maintain and enables simple customer self-service. It is fair to say that we are at the beginning of the conversation with suppliers, but increased pressure from across the sector will hopefully deliver results from software vendors.

8. In government, progress and innovation at the Government Digital Service (GDS) has stalled in the last year, however they continue to improve upon the Gov.uk website and develop services such as Payments and Verify (for identifying customers online). GDS has been most successful in promoting approaches such as user centred service design and agile project delivery, resulting in quicker, better outcomes for citizens. MSDC is increasingly employing these techniques in our operations.

9. In the meantime, new suppliers are emerging to challenge the incumbents. This is no mean feat, given the entrenched nature of some suppliers with their customers, as well as the cost of developing new local government software. MSDC are making use of new suppliers in the market where it is appropriate to do so.

The Council's digital and IT approaches

10. Our approach to IT and digital is to enable the Council's services to be redesigned to better meet our customers' needs, as efficiently as possible. This requires systems and hardware that are flexible, mobile, deliver on customer self-service, and manage data securely whilst also enabling us to use it to understand our customers.

11. We believe that cloud-based technology is the best way to deliver this future of flexible, mobile, customer-friendly and interoperable systems. We want to invest in and exploit a small suite of cloud platforms to deliver all the capabilities we need to help colleagues redesign their services.

12. We are already a fair way down this road. Salesforce is being used as a Customer Relationship Management System (CRM) and is also used to deliver workflows and databases. Office 365 has put email and calendar in the cloud, and also will enable document collaboration, project planning and team communication.

13. When assessing a requirement from a service area, our first approach should be to consider whether existing capabilities can be used to meet that need. Where they can't, we should look to buy a Software as a Service (SaaS) solution. SaaS has a much lower maintenance overhead than traditional, on premise systems, and should also deliver on mobility, self-service and data interoperability. We are already doing this too, with the rollout of the XCD system for human resources and payroll.

14. Using existing cloud capabilities is helpful when we are developing a bespoke workflow, where speed of delivery is a requirement and where we have very specific needs to meet. SaaS suits situations where a larger system is needed that meets needs common to many organisations.

15. Some of our requirements however cannot be met in either of these ways. Perhaps the requirement is too complex for existing capabilities, and there is no suitable SaaS solution on the market. In this case, we will look to host a more traditional application in the cloud, through Infrastructure as a Service (IaaS).

16. With IaaS, we will have a cloud-based infrastructure available to us to host systems and data in the cloud, as if they were running in a local data centre. However, we will access the systems over the internet rather than a local network.

17. Our overarching aim is to limit the amount of on premise infrastructure to the bare minimum, through the use of existing cloud capabilities, SaaS and IaaS.

18. This will enable us to free people up to help services redesign the way they do things, making the most of modern technology, to meet those challenges of increased demand and reducing budgets.

Developments with the Census ICT partnership

19. The Census ICT partnership has changed dramatically in the last 12 months and is now being wound down. All the staff are now employed by their host council, and the last Joint Committee meeting will be held in March 2018.

20. For each council in the partnership, it makes sense to be able to implement their IT and digital strategies without the overhead of partnership working, particularly where those strategies diverge. There will always be opportunities however for the sharing of knowledge, experience and resources and these will be explored as officers in the councils keep one another up to date with progress.

21. There remains a small number of systems that are shared by the councils that made up the partnership. Plans are being worked up for each of these to be returned to the individual councils, or for other arrangements to be made where these make sense – for instance, where group purchasing saves significant budget, we will continue to jointly procure on an ad hoc basis.

22. In terms of the systems hosted by MSDC on behalf of other councils, the Northgate Resourcelink HR system which is only used by Adur & Worthing will be migrated to their hosting environment over the next few months. MSDC also hosts Horsham's Revenues and Benefits system, but this arrangement will end once HDC's new supplier is in place and operational.

Section One: Headline Review of the Digital Programme 2017/18

Themes and challenges - data architecture, migration and quality

23. One of the aims over the phases of the digital programme has been to introduce a consistent approach to data architecture. This is the policies, rules and standards that govern which data is collected, how it is stored, arranged, integrated, and put to use in data systems. This means that the Council knows what data it has and how it can be used across multiple systems. Done effectively this provides a number of single data sources where we know the data handling practices are highly effective and therefore data within them can be regarded as a definitive record. For example, the Council's Gazetteer complies with British Standards and is the standard for address data in the UK. It is updated through our Street Naming and Numbering Service.

24. Other systems across the Council hold address data and changes have not been directly sourced from the Gazetteer. This means addresses in these systems become incorrect over time. New systems are procured that are link to these single data sources and rely on them for updates. For example, the Gazetteer data can be used within the CRM and Waste systems. This has the benefit of ensuring address data, once cleansed, is accurate and that any new addresses are automatically loaded using existing data. This eliminates rekeying of addresses across multiple systems, reducing errors which in turn impact on the service to customers for example in notifications on service changes going to incorrect addresses.

25. There have been significant challenges in migrating data from old systems to newer systems. This is because in many older systems suppliers make it difficult to extract data without substantial switching costs. This can mean taking advantage of newer systems with improved usability and functionality can be prohibitively expensive if only comparing licensing and support costs.

26. New systems are being procured that have the ability to transfer data for no cost and with clearly documented data structures. This means that the Council is able to avoid the costs of moving from one system to another in the future. This allows the Council to move suppliers more easily to take advantage of the market. it also means the Council is more easily able to categorise its data assets to satisfy GDPR requirements.

27. Improving data quality has been a challenge. Problems have arisen when transferring data from one system and matching to single data sources to provide better data handling practices. One data migration identified over 2,000 incorrect address records resulting in a higher number of calls to the contact centre.

CenSus Revenues and Benefits website redesign

28. The CenSus website was designed and implemented several years ago. This meant it was not technologically advanced enough to work with modern browsers or meet customer needs. The site was redesigned earlier this year. The project, excluding existing officer time, cost £3950 for design work, incentives for user testing and improved search tools for customers.

29. The problems were:

- Problems accessing the site on tablets and smartphones.

- Unclear information and structure because of new content being added without any rationalising, moving or amending old content.

- Poor page ordering because of a lack in understanding priority tasks for customers.

- Unclear technical language not aimed at customers.

30. The website also only allowed a small amount of interactivity. Most of the content guided users towards taking action by either contacting the service by phone or printing out a PDF, filling it in and submitting it through the mail.

31. This redesign has delivered a number of efficiency gains. Website analytics for comparable periods pre and post redesign have assessed the effectiveness of the redesign. Site visits have increased by 121% from 2016 to the same period 2017. Page views have increased by 122% from 2016 to the same period 2017 (since launch). Both measures increasing shows that more users are visiting the site and those that do are finding what they need and/or transacting digitally with the service. This means there are more people using the digital service because it is easier to do so. This has corresponded with a reduction in calls to the CenSus Customer Services Team which is stabilising at 11% fewer calls across comparable periods.

32. The number of forms successfully digitally accessed has increased by 402% from 2016 to the same period 2017. The number of documents downloaded since the new site has launched has decreased by 16%. This alone is a efficiency gain of approximately £32,0001 per annum.

Customer Relationship Management (CRM) development

33. The Council's Contact Centre had been operating a CRM system procured in partnership more than ten years ago. In 2015 the Council left the partnership following increases in costs.

34. The CRM had limited integration with other systems across the Council. For example, for customer services staff to access Planning and Building Control systems they needed to log on to separate systems, re-enter data, therefore delaying responses to customers. The large number of processes and procedures handled using e-forms and spreadsheets also presented a level of insecurity in data management. It meant that data was not reused by other systems potentially reducing data quality and meaning many customer contacts took additional time to resolve. These issues meant that the Contact Centre was not meeting targets on call response times and calls were not reducing.

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[1] This assumes all downloaded documents would be submitted to the council. It is calculated by the difference in documents viewed [3921] multiplied by estimated cost of f2f interaction [£8.62], subtracted from difference in documents viewed [3921] multiplied by estimated cost of online interaction [£0.30]. Standard costs here https://www.gov.uk/government/publications/digital-efficiency-report/digital-efficiency-report)

35. The new CRM allows easier technical redesign of business processes and integration with other systems. It is integrated with new waste services system built on the same software, Salesforce. The licencing and support costs are the same as the previous CRM. To date the new CRM has enabled:

- productivity gains by enabling new ways of working;

- faster responses to service requests between customers and contractors;

- resilience, process transparency and scalability to processes reducing marginal costs; and

- Improved data quality, eliminating double-entry and duplication of data.

36. Workflow efficiencies have delivered efficiency gains within the team and this has continued to improve response times and widen the range of services offered. Since the introduction of the new CRM and improvements to workflows the Customer Services team have been able to respond faster to customer calls while at the same time introducing new service lines to the contact centre. This has been achieved thanks to their close involvement in developing and testing the system and openness to adopting new ways of working. The team shares best practice among themselves to speed up adoption and coordinates responses to show and tell sessions to ensure the developers deliver what is required.

COMPARISON OF CONTACT CENTRE WAITING TIMES BY QUARTER 14/15 TO 17/18
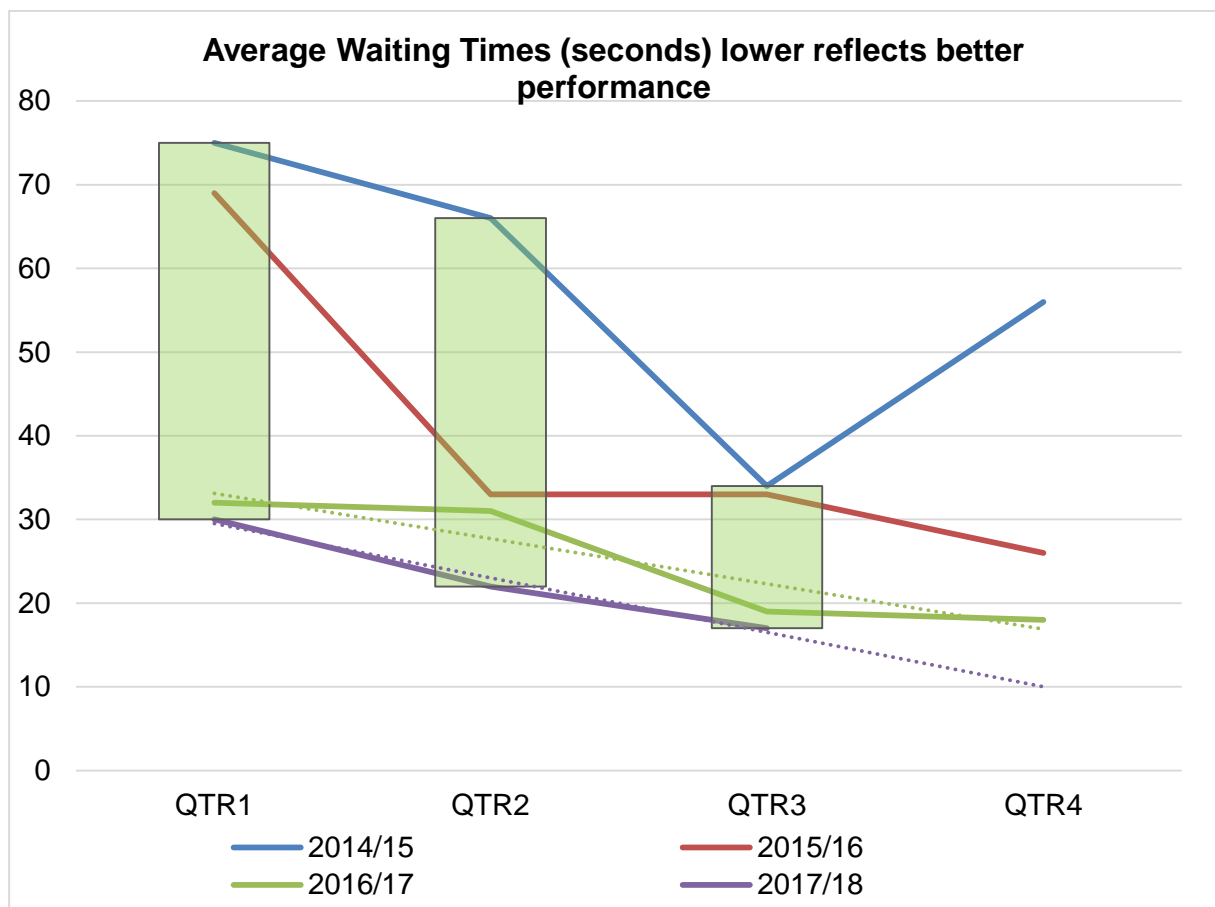
37. Response times in the contact centre are a function of the number of calls, the complexity of calls and the time taken to resolve a customer query. There are seasonal variations in the numbers of calls, for example the 4th quarter sees a rise due to annual billing, licencing and other year-end activities. Additionally, volumes increase during elections and other 'one-off' activity. The lines show a decreasing trend since the introduction of the CRM with the response time reducing by over one half since 14/15 from an average of 59 seconds to 23 seconds. The green bars indicate reductions in response times for each quarter from the former CRM to 17/18. This means the response time target of 30 seconds is now being exceeded and new services being incorporated with no additional contact staff being recruited.

38. Web forms have also been improved in two ways. Frequently used web forms have been simplified and placed more prominently on our webpages. We have also enabled a number of key forms with 'web to case' functionality. This means that the web form creates a case in the CRM and this can follow the same workflow as if a customer contacted the Council by phone. This automation reduces the need for staff to extract information from emails created by forms and then enter them into the CRM. This has helped to reduce calls and increase the use of forms.

COMPARISON OF CALLS TO THE CONTACT CENTRE BY QUARTER 14/15 TO 17/18
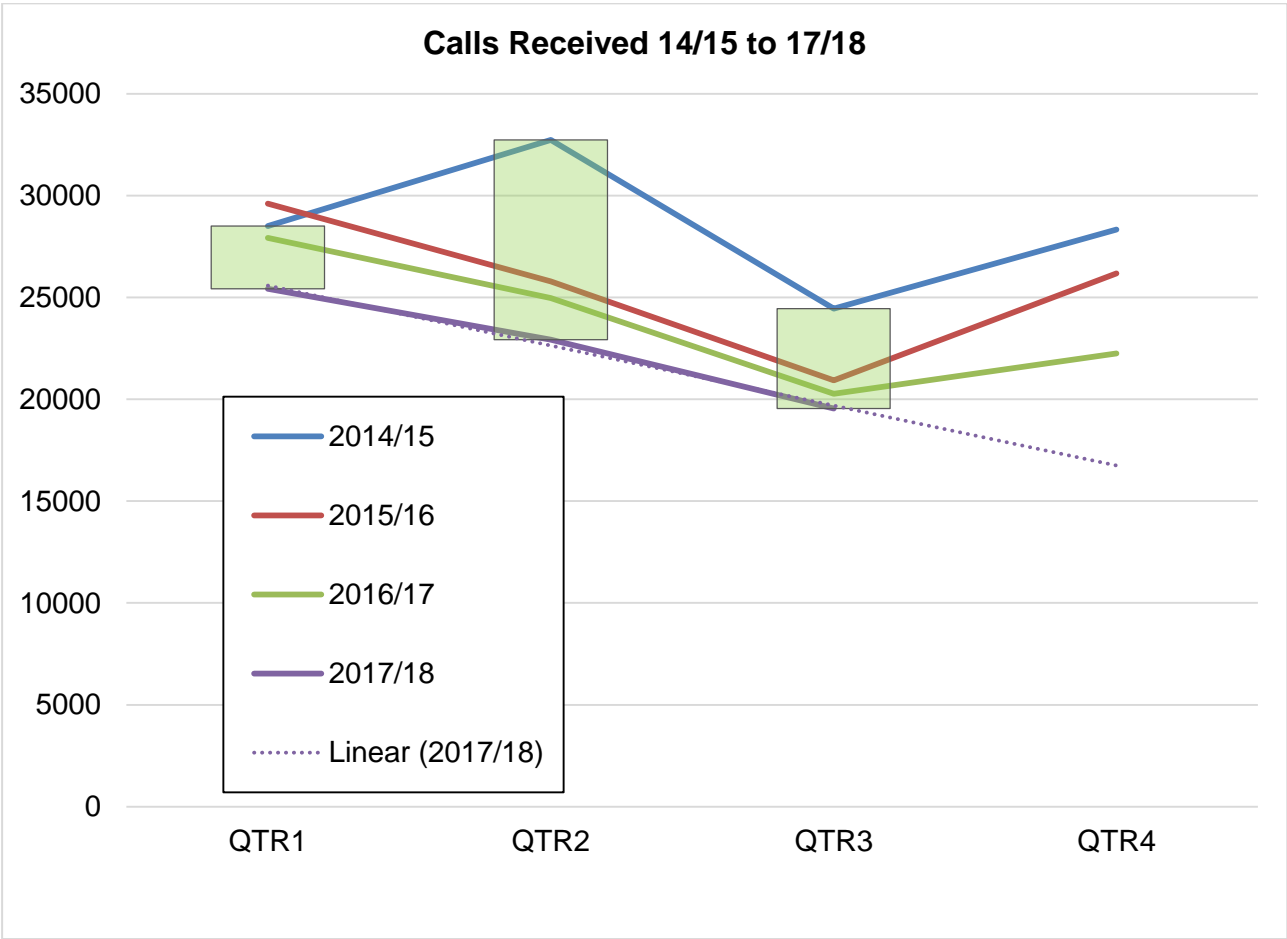
39. The lines show calls decreasing since the introduction of the new CRM. From 14/15 baseline call volumes have decreased by over 20,000 calls. The green bars indicate reductions in calls when comparing quarters. This represents approximately a £51,200 efficiency gain for the customer services team in reduced calls. There are also efficiency gains within other parts of the Council where services have been moved to the contact centre and 'web to case' has been implemented. The gains for customer services are being used to take in more lines of business and provide more customer channels. This includes using social media as a customer services channel (Social CRM) in line with customer expectations. Examples include notifications about the conditions of pitches, publicising events and health and wellbeing initiatives as well as responding to customer queries.

HR system replacement

40. A new HR and Payroll system is replacing the current range of systems as licences expire. The issues with the Northgate ResourceLink HR system were:

- Significant overhead in system updates.

- Workflows could not be developed in-house to allow automation.

- User defined reports were not possible meaning developing management information was difficult.

- Limited integration between HR and Payroll meaning a significant number of manual adjustments were needed in Payroll.

- Access to the system for users only possible on the network. No mobile functionality.

41. The system selected is cloud based, based on the Salesforce Platform and provides easy and secure access to information for staff and managers. Licencing costs are slightly higher than for the previous system (£4,500 per annum). However, efficiencies will be delivered in other areas. The Digital and ICT team are already familiar with supporting Salesforce (CRM and Waste) and are able to design workflows that work with the system. This will provide efficiency gains both in relation to developing the system and in increased automation reducing manager time spent on collating information. This will also mean that hardware will be able to be retired and resources currently focussed on hardware support can be redirected. Evaluation of the implementation will commence in April to identify specific efficiencies compared against

Infrastructure modernisation (Servers, Wifi, cabling)

42. Network infrastructure is a fixed cost for the Council of doing business. It provides services with connectivity to systems and the internet. As with all infrastructure, cabling, switches and servers have a lifespan. As the equipment gets older the costs of support, particularly for switches and servers becomes more expensive and parts harder to source. Cabling similarly ages. It is categorised according to the speed of data it can transmit and can oxidise over time meaning lost data and slower transmission speeds which in turn means systems can crash or timeout.

43. Over the last 18 months ICT have decommissioned 37 servers:

- 11 consolidated on more modern systems reducing support costs.

- 5 replaced by the migration of web content server to cloud services for the same cost as the current licence with improved resilience, development and security updates.

- 4 replaced in the cloud by SaaS (e.g. Office 365 and XCD) with improved resilience, security and updates for the same licencing costs.

- 12 removed entirely by the Council enabling decommissioning of 5 underlying infrastructure elements that supported all of the servers.

44. We are currently replacing servers supporting the SiDem parking system, Academy Revenues & Benefits Sun Servers, and the reminder of the Northgate ResourceLink HR system which will be passed to Adur-Worthing.

45. Efficiencies here relate to savings in the fixed costs related to the server room (energy), reductions in licencing costs, and efficiencies in IT staff time linked to supporting hardware and cost avoidance of more expensive support contracts for ageing hardware.

46. **Cloud infrastructure as a service**

47. At the beginning of 2018, we are entering the implementation phase of our cloud infrastructure as a service (IaaS) project, which will see a large proportion of our data centre move into the Microsoft Azure cloud.

48. The move to cloud IaaS provides several benefits:

- Increased resilience – the sheer scale of operation of large cloud providers such as Amazon, Microsoft and Google mean that the availability and uptime of their platforms cannot be rivalled by in-house offerings. Disaster recovery is a major risk for all Councils at present and the move to the cloud would also help mitigate this.

- Better performance – again, the scale available to cloud providers means that the latest technology is available and supported, meaning our technology will run quickly and efficiently.

- Access to skills and knowledge – as a relatively small organisation, with limited financial resources, it is difficult to recruit staff with skills and knowledge in the latest developments in IT infrastructure. Working with much larger, specialist organisations will ensure that niche and expensive skills will be available when the Council needs them.

- Information security – the Council can maintain an emphasis on excellent IT security by tapping into the greater resources and knowledge that partners will be able to provide. Utilising the guidance issued through central government on cloud security, the Council can ensure maximum flexibility is delivered in the technology stack whilst also ensuring data is as secure as it can be.

49. The first stage of the project was completed in partnership with Adur & Worthing and Horsham District Council. A managed service provider, Eduserv, was appointed, and a discovery phase identified how the data centre currently worked and how it could be migrated into the cloud. The design phase then followed, resulting in a High Level Design for the MSDC IaaS environment, and the selection of Microsoft Azure for our cloud provider. Each council now goes its separate way on the project, however we will work closely with Horsham where we can, who have also chosen the Azure route.

50. Before each system and its related data is moved to cloud IaaS, a bespoke migration plan will be developed to identify the approach and manage related risks. The relevant service areas will be fully informed and any disruption to services will be kept to an absolute minimum.

Revenues and benefits system migration and improvements

51. The CenSus Revenues and Benefits system (Academy) has been running on ageing servers with an operating system that is expensive to support. The project involved moving from this hardware and software to a virtualised infrastructure running the more common and cheaper to support RedHat Linux operating system. The overall aim was to deliver a more sustainable infrastructure for the CenSus Revenues and Benefit Academy Systems providing increased resilience and faster processing capability.

52. The system migration, including full testing was completed in December prior to annual billing. A full assessment of the system will be completed after 6 and then 12 months of running to evaluate projected reductions in downtimes, speeds of system responsiveness and reductions in support costs.

Section Two: Work programme 2018/19

Work Prioritisation

53. The selection of service lines for redesign uses the following principles:

    - high volume, high impact service lines where improvements will benefit a lot of customers rapidly;

    - quick wins, where there is opportunity to do a short sharp piece of work to transform a service (or important aspects of it), for example ordering of the green waste collection service;

    - breaks in contract provision, where a change offers an opportunity for a re-appraisal of what is delivered and how, for example the CRM and HR system replacement;

    - a service line currently perceived as problematic or 'failing', where a service redesign will reduce customer frustration or operational inefficiencies; and

    - opportunities and inter-dependencies within or between business units to provide more connected services to customers (internally and externally).

Headline Workstreams

Introducing more services into the contact centre

54. The introduction of the new CRM with a clear underlying data structure and 'low-code' capabilities has meant that workflows have been built and improved within the system by in-house staff. Theses workflow efficiencies have delivered additional capacity within the team and this has been used to improve response times and allowed the team to widen the range of services offered.

55. This will allow other customer service requests to be introduced to the contact centre. The next phase of service redesign for the waste system will use the functionality that has been developed to free up the waste management team from administrative processing. This work is streamlining workflows by reducing the administrative steps required between the customer service requests and the contractor. This will free up staff time to focus on recycling initiatives, marketing garden waste services and working alongside the contractor to deliver further service improvements.

56. The next service lines being included and/or under investigation for inclusion are:

    - garden waste (first iteration tested and being revised). The team will manage the bulk of the administrative work on signing up, moving and cancellations.

    - bulky waste (testing currently pending policy review).

    - antisocial behaviour (investigating triaging calls and recording information)

The team have used the capacity generated by these efficiencies to take on Social CRM work. This means they are using social media as a customer services channel in line with customer expectations, dealing with direct messages on Facebook or private messages on Twitter. The team are well versed in dealing with the types of enquiries we receive and are able to answer most at first point of contact, only rarely needing to contact the relevant service directly for assistance.

New MSDC Website

57. The website redesign has started and has involved significant user testing to improve usability. This includes reducing the number of clicks for navigation and giving more prominence to highly searched for pages.

58. Work is underway with a copywriter and service teams to ensure the language used is consistent, clear and that technical phraseology is minimised. The design and testing has built on the work that delivered the new CenSus Revenues and Benefits website. It includes work to ensure the language for the site is more accessible and that the information and steps required to complete forms is clearer.

Windows 10, workstation and laptop upgrades

59. The current desktop operating system, Windows7, is due to go out of security support in January 2020. the majority of desktops will need to be upgraded or replaced before this to ensure security & PSN connection certification compliance. The windows10 operating system is more cloud based and this will enable staff to take full advantage of the additional web services available from the Cloud environment and ensure compatibility with software support after Windows7 goes out of support.

60. Over 200 desktops & laptops will need replacing and additional 200 will need memory upgrades to support the new operating system. There is also some desktop software that will need to be upgraded to a Windows10 compatible version. This will support mobile working capabilities for field staff including:

- environmental health

- building control

- tree officers

- estates

Office 365 rollout

61. Email and calendar have been rolled out to staff and Members. The next phase is to move documents and file electronic files to Office 365. Small trials of file sharing have proven effective in providing teams with shared documents and avoiding duplications. Initial projections, using a simple comparison between the cost to provide email on premise versus Office 365's mail boxes online, shows a roughly a 30% saving. This is principally the ongoing efficiency savings of not having to perform manage upgrades on a regular basis. In addition to this Office 365 has two additional features that are particularly important for GDPR and controlling email and data:

- Information Rights Management - providing the ability to control the copying, printing and forwarding of content based on user roles and responsibilities, ensuring greater control of information sharing both internally and with external parties. This is particularly useful for protectively marked emails that might otherwise be shared.

- Retention - providing the ability to ensure data that must be kept is not deleted ad data that must be deleted is identified. This might apply to non-sensitive financial data held that may need to be kept for a long period of time for regulatory purposes.

GDPR preparedness

62. On 25th May 2018 the General Data Protection Regulations (GDPR) come into force. Many of the GDPR's main concepts and principles are much the same as those in the current Data Protection Act (DPA), and therefore most of the approach to compliance under current laws will remain valid under the GDPR and can be the starting point to build from. However, there are new elements and significant enhancements, which means the Council will have to do some things for the first time and some things differently.

63. Done properly, GDPR compliance provides a real opportunity for positive change. Focusing on risk, as well as a more generic approach to cyber resilience should ensure that not only is our data protected, but that business processes and data quality are improved.

64. GDPR applies to personal and sensitive personal data. The definitions of this data have not changed compared to the Data Protection Act other than genetic and biometric data are now expressly categorised as sensitive personal data, and there is also a separate provision for data relating to criminal offences.

65. The definitions of controller and processor are essentially unchanged:

- A Controller determines the purposes and means of the processing of personal data. The Council is a data controller.

- A Processor is responsible for processing personal data on behalf of a controller. Organisations such as Northgate, who scan our Revenues and Benefits incoming communications, are data processors.

66. The main change in this area is that processors now also have direct compliance obligations under the GDPR. They are required to maintain records of personal data and processing activities. They will also have legal liability if they are responsible for a breach.

67. GDPR compliance and effective cyber resilience are two sides of the same coin. It therefore makes sense to take an integrated approach to developing a single roadmap towards compliance and protection.

68. Our starting point is to understand the personal and critical data we hold. Calculating the level of risk to that data can then be determined by looking at where it is stored, how it is processed and if it is adequately protected. This is achieved by the GDPR requirement to document our processing activities. There are also physical assets such as filing cabinets and archives to consider.

69. This means that, not only do we get a complete and consistent understanding of the processes in the organisation (especially where those processes cut across more than one area), we are also raising the awareness of key staff in the organisation. This embeds a principle of privacy by design much more effectively than just providing online learning.

70. As the Council has always complied fully with the DPA, we already have policies and procedures in place that for the most part, will only need a small amount of adjustment to make them GDPR compliant. Our current working practices include:

   - Full set of Information Security policies

   - Subject Access Request procedure

   - Breach procedure

   - A General Privacy Notice

   - Data Protection Code of Practice

   - Basic information on what we do with data on forms where we collect personal information

   - Online data protection training for staff

71. The Council's GDPR plan builds on this work. The detailed high-level plan for GDPR compliance is contained in Appendix 3 and has a number of key tasks including:

   - Alerting services to the requirements of GDPR linked to their specific data (an example for HR services is contained in appendix 1).

   - Follow up training, action planning sessions with teams and regular training for staff and Members.

   - Reviewing the data we already hold and clearing out 'old data' from our network drives and files to ensure we are not holding on to information unnecessarily.

   - Completing privacy impact assessments for all systems.

   - Ensuring data is classified for use in our systems, enabling us to auto detect sensitive data and prevent it from being accidentally sent to the wrong people.

   - Review our consent actions on all forms/e-forms and documents where we may ask customers to provide information to us.

   - Updating policies and code of practice

   - Preparing Privacy notices (see Appendix 2 for an example privacy notice).

   - Ensuring we know where all of our data is stored and have all external processors working on our behalf provide us with relevant security information for the storage of our data.

72. We have also invested in existing systems to support GDPR compliance. For example, the planning system, IDOX, is being upgraded to more easily allow system administrators to define database records or groups of records need to be removed or restricted in order to facilitate compliance.

73. The progress of the action plan will be reviewed weekly and be adjusted according to findings from data audits and progress in implementing work within each service area.

Network Hardware Replacement

74. We are replacing 25 of our 27 Data switches located in cabinets throughout the MSDC campus. These enable staff connection to the MSDC network. These switches were bought in 2007 or before and are now end of life and replacement parts and supports costs are increasing in cost (where they are available). The Core network switch, which is at the heart of the MSDC network, is also being replaced to ensure all traffic throughout the network can negotiate at higher speeds. Ageing cable will also be replaced with 'faster' cable so that systems to enable improved data speeds.

Policy Context

75. The Digital Programme is intended to support the Council in its aim of continuing to increase efficiency whilst protecting front-line services, in line with the Corporate Plan and Budget.

Financial Implications

76. The work will be delivered through existing budgets and the IT reserve established for the digital programme. A number of projects require initial capital investment in order to achieve longer-term savings. Requests for such investment will be made in the usual way as a bid to the capital programme for approval by Cabinet each bid will be supported by a business case.

77. Under the GDPR the potential fines for breaches have increased considerably. The fines are discretionary, rather than mandatory; they must be imposed on a case by case basis and should be effective, proportionate and dissuasive. There are two tiers of fines that can be applied:

   • Up to 10 million Euros or 2% of global turnover, whichever is higher

   • Up to 20 million Euros or 4% of global turnover, whichever is higher

78. Infringements of the organisation's obligations, including data security breaches, will be subject to the lower level, whereas infringements of an individual's privacy rights will be subject to the higher level.

Risk Management Implications

79. Making changes to services carries with it a risk of impacts on service quality. These risks are minimised by ensuring staff are fully involved in the development of any changes, and that proposals are prototyped and tested to ensure they result in a positive impact on the service and the customer. Customer involvement is also ensuring the changes reflect customer need and expectations.

80. A comprehensive ICT Risk Register is maintained. The current top five risks and associated mitigation strategies currently are:

Risk Description	Controls
Insufficient capacity to cope with workloads and unexpected demands (for example introduction of unforeseen legislation, significant system changes outside skills set of the team)	Ensure that adequate resources are identified and included in project costs – ongoing. Monitor ongoing service capacity levels (weekly) and take appropriate action as necessary – ongoing action Establish trusted suppliers with specific technology expertise.
Failure to maintain service delivery in the event of disruption e.g. fire, flood, power failure, IT failure, Industrial action etc.)	Develop & maintain departmental business continuity plan in line with specific BCP/DR processes – now in place.
Penalties imposed due to failure to meet government agenda and or legislation	All ICT management to keep abreast of changes and report implications to the Head of Digital – ongoing review through monthly Management meetings.
Failure to implement and manage agreed security controls	Project in place to move, where possible, to IaaS to take bulk of patching processes & agree maintenance windows for patching & testing of servers. An ITIL compliant Change Control process has been in place for and has greatly reduced the risk (incidence) of errors & downtime.
Compromise of IT systems due to unknown vulnerability (software, hardware, physical and staff behaviour)	Training and awareness programme for staff. All non-essential administration accounts and servers have been deleted or decommissioned to minimise the potential for errors & introduction of vulnerabilities.

Equality and Customer Service Implications

81. When making changes to services, those with 'protected characteristics' under the Equality Act are given particular consideration. Wherever possible the Council aims to maintain choice in how a service can be accessed (i.e. by phone, face-to-face, or via the web) to provide maximum flexibility to the customer. Service changes are also subjected to customer impact assessments prior to their implementation.

Background Papers

Service Redesign report of the 14th September 2016,

Service Design and Digital Programme 8th February 2017.

Appendix 1

Example copy of information to HR

You may have heard of the GDPR (General Data Protection Regulation). It is a EU Regulation which was enacted before Brexit, so we still have to comply with this. It is currently in force, but organisations have until May 2018 to be fully compliant. We are beginning work on this now and will be in touch with departments to cover what needs to be done.

I thought I would give you a brief overview of the things HR will need to take into consideration. Some of these things will need to be dealt with in conjunction with the Data Protection Officer e.g. SARs, data storage, responsibility retention. The things to start considering now are:

- HR needs to understand and plan for how it will meet the requirements of GDPR and how it will use data provided by, gathered on and kept about employees.
- HR is not alone responsible for GDPR

Before employment

- at the recruitment stage HR will need to make clear to applicants and potential employees how data will be used during the application process and what the organisation's Data Protection Policy is.
- this has to be made very clear and 'up front', not tucked away in small print.
- consent to hold and process employee data must be obtained.
- data on unsuccessful candidates must not be retained without consent - and then only for a limited period.

During employment

- on employment, consent must be confirmed again in a clear and explicit manner
- employees must be made aware of GDPR and the Council's Data Protection Policy.
- Data Protection training needs to be included in induction and followed by annual checks.
- employees must be made aware of their personal responsibility for proper use of the Council's data, for example in marketing activity, legal and financial issues, use of personal storage devices etc.
- there must be clarity over prevention of data breaches, what happens should such breaches occur, and standard procedures for dealing with them.
- there will be Subject Access Requests (SARs) - employees asking to know what data the Council holds on them.
- consideration should be given to the issue of 'the right to be forgotten'. This is a tension between the Council's need to keep records - for example about disciplinary matters - and the individual's rights for data about such issues to be removed once, say, warnings, have expired.
- changes in the Data Protection Policy - and in the law - need to be made clear to all employees.

After employment ceases

- clarity about how long data on former employees is kept, what it includes, for what purposes it will be used (e.g. references) and the individual's right to see it and have it removed.
- the issue of 'Dark Data' - the Council knowing what exactly what data it has where it is, what it might have forgotten about and how to deal with it.
- One of the key principles of GDPR relates to 'storage limitation'. Data must only be kept for a limited period. The very existence of 'Dark Data' will constitute a breach.

Appendix 2
Example of a Privacy Notice

Your Personal Data:

What we need

Mid Sussex District Council will be what's known as the 'Controller' of the personal data you provide to us. The data we collect may include personal data and sensitive personal data. This may consist of name, address, bank details, health details etc.

Why we need it

We need to know your basic personal data in order to provide you with council services. We will not collect any personal data from you we do not need in order to provide and oversee these services

What we do with it

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information is located on servers within the European Union. No 3rd parties have access to your personal data unless the law allows them to do so.

How long we keep it

The Council has a data retention schedule and the various service areas all have differing lengths of time they are required to keep data. In some cases, such as planning applications, this may be for a lifetime, but for other information e.g. correspondence this may only have a 2-year retention period.

What we would also like to do with it

We would however like to use your name and email address to inform you of service changes or offers such as green waste. This information is not shared with third parties and you can unsubscribe at any time via phone, email or our website. Please indicate below if this is something you would like to sign up to.
Please sign me up to receive details about future offers from Mid Sussex District Council.

What are your rights?

If at any point you believe the information we process on you is incorrect you request to see this information and even have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter.
If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office (ICO).
Our Data Protection Officer is Sheila Harris and you can contact them at foi@midsussex.gov.uk.

Appendix 3

GDPR Programme - Pdf Attached.