COTSWOLD
District Council

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| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **AUDIT & GOVERNANCE COMMITTEE**<br>**27 JANUARY 2026** |
| Subject | **INFORMATION GOVERNANCE UPDATE & SENIOR INFORMATION RISK OWNER (SIRO) ANNUAL HIGHLIGHT REPORT 2024/25** |
| Wards affected | All |
| Accountable member | Councillor Mike McKeown<br>Email: mike.evemy@cotswold.gov.uk |
| Accountable officer | Jane Portman, Chief Executive Officer<br>Email: jane.portman@cotswold.gov.uk |
| Report author | Angela Claridge, Director of Governance & Development (Monitoring Officer)<br>Email: angela.claridge@cotswold.gov.uk |
| Summary/Purpose | To provide the Committee with its first Information Governance & SIRO report, summarising the Council's key actions and progress in reducing information risk and strengthening data and information management controls during the 2024/25 financial year. |
| Annexes | Annex A Information Governance & Senior Information Risk Officer (SIRO) Report 2024/25 |
| Recommendation(s) | That the Audit & Governance Committee resolves to:<br>1. Note the report of the Senior Information Risk Owner (SIRO) on Information Governance for the 2024/25 period<br>2. Approve the future inclusion of the SIRO's Annual Report within the Annual Governance Statement for reporting purposes |
| Corporate priorities | • Delivering Good Services |
| Key Decision | NO |

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| Exempt | NO |
| Consultees/ Consultation | CLT including:<br>• Chief Executive Officer<br>• Deputy Chief Executive & S151 Officer<br>• Director of Governance & Development (Monitoring Officer)<br>• Director of Communities & Place<br>CDC Governance Group including:<br>• Chief Technology Officer<br>• ICT Audit & Compliance Manager<br>• Compliance & Information Governance Officer |

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## 1. EXECUTIVE SUMMARY

**1.1** This is the first time this Committee has received an Information Governance & Senior Information Risk Officer (SIRO) report (Annex A). It provides an overview of the Council's key actions and positive progress in information governance and information risk management during the financial year 2024/25, outlining the advancements in reducing information risk and strengthening controls around data and information management.

## 2. MAIN POINTS

**2.1** The Council's Senior Information Risk Officer (SIRO) has accountability for ensuring that effective systems and processes are in place to address the Information Governance agenda including records and document management. With completion of phase 1 of the Publica review in November 2024, the role of SIRO moved from Publica to the Council and the role is held by the Chief Executive Officer.

**2.2** The SIRO is responsible for the corporate approach to managing information risk including:

- acting as corporate champion for information governance, security and data protection
- providing a focus for the management of information governance at a senior level
- ensuring sufficient professional capacity and expertise is in place
- ensuring that the Council has appropriate information security policies in place
- providing advice and reports in respect of information security incidents, risks and trends
- assessing how the Council's strategic priorities may be impacted by these incidents, risks and trends and how they can be managed, resourced and scrutinised effectively
- implementation of the Council's approach to the management, retention and destruction of paper and electronic records.

**2.3** The SIRO is supported in this work by the Data Protection Officer (DPO) which is a statutory role required by Article 37 of the UK General Data Protection Regulations (GDPR) and Section 69 of the Data Protection Act 2018 and other compliance and governance officers.

**2.4** It is considered best practice to report these areas and best practice to members and the report aligns with the Audit & Governance Committee's responsibility to ensure

the Council's control framework remains robust. For future reporting, it is recommended the SIRO's report is included with the Annual Governance Statement

## 3. FINANCIAL IMPLICATIONS

**3.1** Proactive information management helps reduce Council costs by minimising risks such as regulatory fines and expenses from cyber-attacks.

## 4. LEGAL IMPLICATIONS

**4.1** Information management and data protection are subject to a range of legislation including the UK General Data Protection Regulation and Data Protection Act 2018 as amended, as detailed in the Information Governance & SIRO report 2024/25.

## 5. RISK ASSESSMENT

**5.1** Not producing an Information Governance and SIRO report may result in insufficient oversight of information risk management, leading to potential non-compliance with statutory requirements (e.g., UK GDPR, Data Protection Act 2018), increased vulnerability to data breaches, and reputational damage. This lack of formal reporting could also hinder transparency, accountability, and continuous improvement in information governance practices.

## 6. EQUALITIES IMPACT

**6.1** Data Protection policies and procedures are available on the Council's website. Alternative channels remain available for those customers who may not be able to access or use digital services and reasonable adjustments for disabilities are made where required.

## 7. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**7.1** None arising from this report.

## 8. BACKGROUND PAPERS

**8.1** None.

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