

ICO Enforcement Notice - Action Plan						
Plan ref.	Category	Task	Responsible	Action required / Undertaken	Progress status	Completion Date
1.0.	Staff Transfer	Transfer staff from Contact Centre to IG Team at Civic Centre		Meetings to discuss undertaken 11/12/24 & 21/01/2025. Transfer date = 01 Feb 2025.	Completed	01/02/2025
2.0.	Harmonisation / Recruitment	To bring the 2 separate service together. Revised IG Officer Job Descriptions to be drafted and evaluated. Business Support JD also created.		Further to various reviews IG Officer JD submitted for evaluation 15/09/25. Approved January 2026 and shared with staff seeking expressions of interest 08January26.	Completed	08/01/2026
2.1.	Harmonisation / Recruitment	Audit D2502 Recommendation 1 - Barriers to finalising a qualified and experienced Information Governance team should be reviewed with Human Resources at Senior Level. A robust plan and timeline should be developed and regularly reviewed until capacity issues have been resolved.		Recruitment solution developed. New job descriptions evaluated and transfer of existing staff members in progress as is recruitment of additional posts. Process being reviewed and monitored by the Senior Information Risk Owner (SIRO) Group until capacity issues have been resolved.	Completed	15/01/2026
3.0.	Harmonisation / Procedures & Systems	Established Liberty Create to be system used for processing requests as it is an in house system with our own developers.		Corporate view clarified in confirming we would use our own Liberty Create system with in house developers and reduce costs of an additional external system.	Completed	01/07/2025

3.1.	Harmonisation / Procedures & Systems	Audit D2502 Recommendation 2 - An operational guidance harmonisation plan and timeline should be developed including document management arrangements aligned to the Council's Managing Your Records Guidance.	[REDACTED]	<p>Audit response: To develop a standard operating procedure (SOP) manual, which includes guidance on the various actions required, as part of the staff harmonisation work.</p> <p>In moving to a single system for request logging, guidance will focus on the Liberty Create system only.</p> <p>Procedure and guidance documents to be created in conjunction with existing staff, through review of existing processes and approach in operation in creating the most efficient and effective process.</p> <p>Staff ownership of the procedures seen as key to allow the processes to be continuously reviewed. Review timelines to be incorporated to ensure they are periodically reviewed and relevant to current legislation and software. (This action will also link in with the request for Directorates to nominate 'Service Champions' who will support the IG Team in confirming correct contacts for allocation and to input into the resolution of performance issues.)</p>	Work on creating the SOP Manual will take place from February – April with a view to the manual being operation by the end of April.	
3.2.	Harmonisation / Procedures & Systems	Develop a single disclosure log.	[REDACTED]	25/06/25 Advised [REDACTED] to launch the Liberty Create Disclosure Log with cases listed going back to 01April 2025. The HotH log is already in place and remains visible for cases progressed through that system.	Completed	25/06/2025
3.3.	Harmonisation / Procedures & Systems	Audit D2502 Recommendation 7 – Use a single Council email address for customer requests.	[REDACTED]	As part of the service harmonisation work, a single email address is to be adopted for customer requests for FOIs/EIRs & SAR requests. This recommendation links with other access actions in relation to the information.governance@cumberland mailbox. This is the former Cumberland mailbox where enquiries are received to currently. It will become the single advertised contact on the web page. The HotH system links to the information@cumberland mailbox and will have to be phased out once the open requests in HotH are concluded.	Pending - Target date for completion 01April26.	

3.4.	Harmonisation / Procedures & Systems	IG web presence on Cumberland.gov.uk (and any legacy sites still visible) to be reviewed to ensure links/references to HotH are removed and all online request forms point to Liberty Create. See also linked web action at task 7.0.	[REDACTED]	To ensure all requests are received into a single system and single mailbox contact. See also Task 7.0 below.	Pending - Target date for completion 01April26.	
4.0.	Training & Development	Audit D2502 Recommendation 3 – Document and manage a training schedule demonstrating that all relevant training requirements for IG team members and the wider Council are delivered in an efficient and timely manner.	[REDACTED]	A skills matrix is to be created for the IG & Disclosure Officer role as well as the IG Senior Support Officer. The matrix will incorporate the skills, knowledge & learning required to allow proficiency in all elements of the role(s). Target dates for completion: 28 February 26. The delivery of the matrix elements will be undertaken on a rolling basis for staff, with the elements 'signed off' when deemed to have been completed. To commence from 01 March 26. Wider training for Council staff as to the requirements in dealing with requests is to be developed through the e-learning system to allow it to be undertaken by officers when required, should their role entail responding to statutory requests. *31 July 26 for E-Learning packages. * This date is subject to the availability and capacity of L&D colleagues to create the E-Learning content. See also Task 4.3. below.	Pending	

4.1.	Training & Development	Audit D2502 Recommendation 6 – Management to sample check all officer's work and record the results to inform officer training and improvement.	[REDACTED]	<p>Sampling actions to be incorporated as:</p> <ul style="list-style-type: none"> Sampling of Internal Review responses as allows check of Officers initial response and considerations given by colleague who undertook the internal review. Review of ICO enquiries received, as to the actions taken leading up to the matter being escalated. Informal checks as part of the everyday interactions where officers seek clarification or guidance in how to respond to enquiries. Case check as part of 1-2-1 discussions in providing support and guidance which will also identify additional learning and training that may be required. All Officers will be required to complete the Information Governance & Disclosure Officer skills matrix. The matrix completion will provide the knowledge and skills to allow officers to be cross skilled. The completion of each element will see a review of work undertaken to ensure the officer has understood the process and any related legislative knowledge. 	Pending - 01 April 2026 seen as the commencement of the sampling. The actions, once implemented will become an ongoing process.	
4.2.	Training & Development	Service Training: All current Service Staff (former Districts) who respond to requests via the HotH system will require training and guidance to be provided on the Liberty Create system.	[REDACTED]	Training is to be provided in advance of the closure of the HotH system for receipt of new requests.	Pending	
4.3.	Training & Development	New session to be added to the 'Being a Cumberland Manager' training programme, to ensure staff understand IG processes. This will be provided by the IG team, including the MO and DPO.	[REDACTED]	This requires the recruitment of additional staff to create capacity to allow for training documentation to be captured and developed. The delivery date is subject to availability and capacity of L&D colleagues to create the E-Learning content. *31 July 26 for E-Learning packages. * This date is subject to the availability	Pending	
5.0.	Risk Management	Audit D2502 Recommendation 5 – Risk that 'the organisation is failing to handle information requests under the Data Protection Act 2018 and the Freedom of Information Act 2000/ Environmental Information Regulations' should be rescored and escalated to the Senior Leadership Team.	[REDACTED]	<p>Information Governance Operational Risk register to be revised and re scored to capture increased risk with a view to escalating the risk to Chief Legal Officer/SIRO to allow for SLT oversight/management.</p> <p>31st March noted as implementation date to allow for other recommendations to be embedded which will impact the overall risk score.</p>	Pending	

6.0.	ICO Practice Recommendtn. FPR0987688 28/05/2025	Time limits for responding to requests. The Council should use the Commissioner's FOI self-assessment toolkit to improve its timeliness compliance.	[REDACTED]	This will be reviewed further to completion of the tasks contained in Plan refs 2-4 in establishing where further work may be required or additional actions taken.	Pending - Tasks 2-4 to be completed in advance.	
6.1.	ICO Practice Recommendtn. FPR0987688 28/05/2025	The Council's request handling procedures should include provision for when a response is late, or is likely to be late at any stage of the internal processes, it is clear when and to who to escalate, who is responsible for taking action, the action they will need to take, and by when.	[REDACTED]	This action should be incorporated as part of Task 3.1 and creation of the operations manual.	Pending - Task 3.1. completion.	
6.2.	ICO Practice Recommendtn. FPR0987688 28/05/2025	The Council must ensure that its information rights training is sufficient to ensure that it has adequate coverage in place in order that request handling times do not fall below a compliant level in the event of the departure of key staff members.	[REDACTED]	Each team member will have their own particular specialism but will be able to work across the wider range of IG functions. This will improve resilience, enable IG officers to provide expert advice as well as providing access to recognised qualifications to improve job satisfaction. At January 2026 - 2 Team Members have undertaken the Act Now Practitioner Certificate. 1 Team member due to commence the DPO Practitioner certificate at the end of the month. A review will be required of any newly appointed staff in assessing if training required. Job role is asking for applicants to hold these qualification.	In progress - Completion of training, skills matrix & recruitment required to allow for task closure.	
6.3.	ICO Practice Recommendtn. FPR0987688 28/05/2025	The Council should create an action plan with appropriate processes put in place to ensure 90% timeliness is achieved and the backlog of overdue requests is cleared, both by 1 November 2025. This action plan should be supported by a 'lessons learned' exercise, which examines the root cause of delays from allocation through to clearance at different stages, with mitigations for any recurring problems addressed specifically in the plan. The action plan should be published on its website for full transparency about the improvements it is making.	[REDACTED]	Approach taken was for an Internal Audit to take place to review the service and make recommendations for change. The report would form the basis of the action plan and provide the lessons learned report. This route will ensure more focus as will be subject to Scrutiny review, at which point reports will be publicly available. Draft report for consideration was provided 08January26.	Completed	08/01/2026

6.4.	ICO Practice Recommendtn. FPR0987688 28/05/2025	The completion of outstanding requests was included in the initial recommendation. At the update provided 20January26 there were 116 outstanding requests in relation to requests received up to the 15December2025. The action was: The Council should create an action plan with appropriate processes put in place to ensure the backlog of overdue requests is cleared. N.B. An amended completion deadline is awaited as part of the formal enforcement notice to be issued.	[REDACTED]	Previous work saw lists of outstanding cases to 31 March 2025 produced from both systems for review and completion. By January 26 all cases received on Liberty to 31March25 were cleared although 25 remained on HotH. On recruitment of further resources all outstanding cases to be ringfenced for completion with existing staff focusing solely on new requests.	Pending	
7.0.	Performance Reporting	Performance Reporting: The ICO Practice Recommendation included: The Council should publish its information access request statistics in accordance with part 8.5 of the Code and make these easily accessible on its website. These statistics should include the detail specified in part 8.5 of the Code and be updated quarterly in accordance with part 8.6 of the Code.	[REDACTED]	Performance data is currently published but only relates to the 'Percentage of FOI/EIR responded to within 20 working days'. This is reported to the Council's Executive Committee as part of the 'Corporate Performance Report' which is provided on a quarterly basis. (See 14October25 meeting. Corporate Performance Report Pages 145-190. FOI appears on page 187 re CPDP 53 indicator). This however does not include all the heading set out in 8.5 of the FOI Code of Practice. Web page providing statistics to be linked with Task 3.4. above.	In progress	
7.1.	Performance Reporting	To establish process for sharing performance data across all Directorates. This will link in with the Corporate Scorecards currently being produced at Corporate level.	[REDACTED]	Will also require IG Service to have moved to a single system to allow real time data links from the system to the report trackers.	Pending	
8.0.	Publication Scheme	Publication Scheme - Reviewed, Ownership established and data published. IG to work with Directorate Champions in establishing a Publication Scheme in order to meet our statutory open data requirements as stipulated by the Transparency Code and Section 19 of the FOIA. This is a key task which has not to date been possible owing to the number of systems and processes, however, it is a requirement and publication of open data on the web site will reduce the demand for FOI/EIR handling going forward.	[REDACTED]	Once process for publication established, this will become an ongoing task in monitoring the scheme to ensure that service colleagues are updating the information they are responsible for within their service area.	Pending	