City of Wolverhampton Council

2021 - 2022 Annual SIRO Report

Index

DPO Assurance Statement

It is my consideration as the Council's Statutory Data Protection Officer (DPO) that the Council has complied with its duties under UK GDPR, Data Protection and Freedom of Information legislation.

In the aftermath of the Covid pandemic and the unprecedented challenges it placed upon the whole Council, the Information Governance (IG) team has continued to maintain its exemplary seven-year record of ensuring the Council meets its statutory compliance deadlines in relation to Data Protection and Freedom of Information Acts.

The IG team have continued to forge stronger working relationships with leadership teams, resulting in earlier engagement, better integration, and a more robust compliance platform for each individual leadership area. This working model will continue and be refined through 2022-2023, with a reset and refocus of priorities having already taken place in the latter quarter of this year.

Information risks have in most cases been reduced across the year or maintained at an acceptable level. Any residual risk rated amber or red have been transferred to the 2022-2023 IG risk register where they will continue to be monitored and managed.

Forward plan – the focus for the next year is to continue to meet all statutory requirements and in doing so maintain the Council's high-performance standards. In addition, employee awareness raising will be spot-lighted through various initiatives such as the delivery of role-based training for specialist roles and the development and rollout of more detailed procedures and guidance documents under the new IG policy framework. The ease of monitoring and reporting of mandatory IG training by managers and senior managers will also take priority to help mitigate any dips in compliance at any one time during the year so that we consistently maintain the 95%+ compliance standard and can report it to the regulator with ease, should we need to. With the growing digital and data landscape, focus will be placed on reviewing the Council's approach to records management, particularly around records retention and digital continuity and a work programme will be developed for later approval at IG Board. Operational work with leadership teams will continue, however there is a desire to build on longer term strategic work through more collaborative working and alignment of leadership road maps; this will help us deliver current and future Council services effectively and compliantly through a One Council: Organisation, Families, Communities and Place approach.

It is worth noting that as part of the UK's National Data Strategy and in line with its proposal to reform the UK's data protection laws, the government launched its consultation "Data: a new direction" in September 2021. The government response to the consultation was published in June 2022 and initial observations noted; however, a watching brief is to be maintained on the upcoming Data Reform Bill to ensure the Council is conscious of any impending statutory changes and any operational challenges it could bring.

Introduction

This report provides an update relating to the responsibilities of the Council's Senior Information Risk Owner (SIRO) and outlines information governance activity and performance during the 2021-22 financial year. It provides assurances that information risks are being effectively managed; what is going well; and where improvements are required. The report also provides assurances that personal data is held securely; information is disseminated effectively and provides an overview of key performance indicators relating to the Council's processing of information requests within the necessary legal frameworks.

The Annual Report;
- Provides an update on the action plans the Council has in place to minimise risk or improve performance.
- Documents organisational compliance with the legislative and regulatory requirements relating to the handling and processing of information and provides assurance of ongoing improvement to manage information risks.
- Details any serious information breaches within the preceding twelve months, relating to any losses of personal data or breaches of confidentiality.

The Council continues to be committed to effective information governance, with an information governance framework in place to ensure the council complies with legislation and adopts best practice; this is reviewed every two years or sooner as required by legislation. Governance arrangements are closely monitored via the Information Governance Board (IGB) and Senior Executive Board (SEB) and through the Caldicott Guardian function to ensure systems, policies and procedures are fit for purpose; and that all staff and elected members understand the importance of information governance and security so that good practice is everyone's business and embedded as part of the Council's culture.

Statutory and Regulatory Activity - identifying the Council's priorities and the associated risks

The Council is required by statute to provide or undertake certain functions in line with the following legislation or codes of practice:

- Data Protection Act 2018
- UK General Data Protection Regulations
- Freedom of Information Act 2000 (FOI)
- Environmental Information Regulations 2004 (EIR)
- Computer Misuse Act 1990
- Privacy and Electronic Communication Regulations 2003
- NHS IG - Data Security & Protection Toolkit
- Cyber Essentials Plus +
- PSN Certification
- Records Management under Section 46 of FOI and EIR
- BSI0008 Legal admissibility of scanned electronic information.

The Council is required to respond to Freedom of Information/Environmental Information requests (FOI/EIR) and Subject Access Requests (SAR) within statutory deadlines as mandated by the relevant Act.

The table below demonstrates the Council's continued exemplary performance in relation to these targets.

Table 1.0 - Requests received, responded to and reported to the ICO - 2021 to 2022

Statute	Number received/reported	% Requests responded on time	Escalated to ICO
Disclosures and Subject access requests under DPA	756	97.4%	0
FOI	1216	92.5%	0 (from 19 internal reviews)
Information Incidents under DPA	77	N/A	2 (voluntary)
Total	**2049**	**N/A**	**2**

It is pleasing to note that only 1.5% of all FOI requests generated a statutory internal review and that that 94.4% of all information requests (FOI & SAR) were responded to within the statutory timeframe. Of the 2049 instances referred in the above table only two (<0.1%) were escalated to the ICO; these were two voluntarily reported information incidents in consultation with the SIRO and the DPO and none of these generated any decision notice or financial penalty from the ICO.

Please see **appendix 1** for a summary of annual performance for 2021-2022 and against previous years. Due to operational issues within the team this year (particularly the period Q3/Q4 as previously reported to the Information Governance Board) overall performance has fallen from 98% to 94.4% for this year. This however is still well above the 90% threshold, as set by the Information Commissioner's Office.

Table 2.0 – Analysis of FOI Requests and DPA requests

Exemption/Exception - top three applied - FOI	No. received		% based on total received
Section 21 - Data already published	96		7.9
Section 43 - Commercial interests	28		2.3
Section 31 – Law Enforcement (new)	22		1.8
Service Area – top three volumes received - FOI	**No.**		**%**
City Environment	312		25.7
Finance	164		13.5
City Assets and Housing	139		11.4
Service Area – top three volumes received - SAR	**No.**		**%**
Children's Services	63		28
Adult Services	52		23.1
City Assets and Housing (new)	30		13.3
Service Area – top three volumes received - Disclosures	**No.**		**%**
Finance (Police - Council tax address checks)	211		40
City Environment (CCTV)	197		37
Education and Skills - (Police – address checks)	49		9
Requestor Type – top three - All	**No.**		**%**
Public	1211		61

| Organisations	362	19
Media	159	8

The arrows in the above shows the direction of travel in comparison to last year:

Currently 7.9% of all incoming FOI requests can be answered as the information requested is already available; this is a slight drop from last year from 9%. If more information is made available on-line, then the Council will be able to refer requests to these data sets as opposed to processing requests through teams and service areas. Collaborative working between Information Governance and Data Analytics has begun for the year 2022-2023 including a review of all incoming FOI to identify if there are recurring themes and to see the feasibility of making additional data sets available to the public.

As expected, most SAR requests (these are personal data requests) are made to the Adults and Children' services – the majority being individuals wanting access to their historic social care files. These are the most voluminous and complex of personal data requests received, and the most commonly applied exemptions are third party information and legal privilege. Requests for information made by third parties are usually in relation to CCTV footage from Insurance companies and individuals, along with address checks requested by the Police. The number of disclosures to third parties has increased by more than 100 requests over the previous year.

A breakdown of the type of requestors is also maintained within iCasework, our case management system. Nearly two thirds of all information requests received are from the public. However, this is limited by the information provided to us, hence if a requestor, even if they work for a media company, submits a request as an individual, it will be classed as a public request.

Breach Management
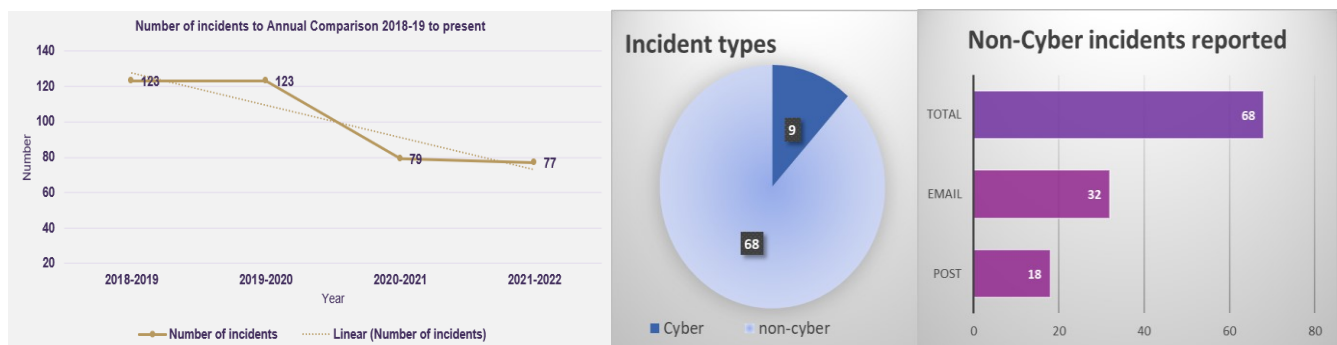
Please see below for a summary on all Incidents and Incident types reported within the financial year and across the last four financial years.

The overall number of incidents for 2021-2022 (77) remains consistent with the previous year 2020-2021 (79). As in previous years the main issue remains communications (non-cyber physical and email) being sent to the wrong recipient, this error accounts for 65% of all breaches reported.

Whilst this risk can never be eliminated due to human error, a number of mitigating actions have already been taken to continually reduce this – such as targeted training, raising awareness and follow up action through incident reporting feedback and at Leadership team meetings. Going forward with the introduction of rights management on our sensitivity labels, system-based restrictions will be applied to all emails and documents; this, along with more refined training

including themed messages, may assist in reducing the numbers of emails and post sent in error.

As a result of the revised working practices, actual or potential information incidents are raised and discussed at each leadership team meeting and any identified learning points are put in place. This has been identified as a more robust process for raising awareness, identifying themes across a service area and is a positive factor in mitigating future incidents and risks.

On review of the two data breaches reported to the ICO, one related to an inappropriate verbal disclosure over the telephone, and one was failure to use the Blind Carbon Copy (BCC) function on an email to multiple parties. Both cases were self-referred to the ICO by the Council and both breaches resulted in no further action from the ICO. These two incidents do not identify a pattern or theme in types of breaches.

Associated Risks and Considerations in relation to statutory and regulatory activities

While the overall performance on FOI and SAR/DP requests for 2021-2022 has been slightly lower than the levels delivered by the team in previous years, the service still achieved 94.4% which still sits comfortably above the 90% ICO threshold. A requirement for additional resources to support the transactional IG function was identified towards the end of 2021-2022 and following approval by the Board, these were put in place for the start of 2022-2023. The objective of this is that performance should as a minimum be maintained or improved. This will be monitored throughout the first part of 2022-2023 and reported back to the SIRO at the mid-year stage.

Compliance Actions

For 2021-2022 the Council undertook the following compliance actions:

Standard/Compliance	Comments and Actions
DSPT	Fully submitted for 2021-2022. Unlike in 2020-2021 no action plan was needed for any further remedial work.
Cyber Essentials Plus	This area of work is undertaken by Digital and IT but does feed into DSPT. Cyber Essentials accreditation was achieved in July 2020 and was renewed in July 21.
PSN	This area of work is undertaken by Digital and IT but directly feeds into the DSPT. This was successfully passed in February 2021 and was renewed in March 2022.
Transparency Code of Practice	• Work was undertaken in the previous year (2020-2021) to review and update the Council's website to improve accessibility to data sets as defined by the Transparency Code of practice. • Information Asset Registers have been updated in accordance with revised guidance from the ICO; these will be integral to the collaborative work being undertaken with Digital and Analytics and Leadership areas.
NHS Digital Audit of Civil Registration Data Set for Public Health	All CWC actions have been completed however further queries are outstanding in relation to other third-party actions.
Scanning in	Following the award of contract, IG are continuing to engage

Accordance with BS10008	through workshops which have been booked in for 2022-2023; this will include support in requirements gathering on meta-data, retention, current storage and cataloguing of information.
LEXCEL	The IG team assisted with Legal Services to ensure ongoing compliance with GDPR for their annual accreditation with LEXCEL.

IG Work Undertaken in 2021-2022

In addition to the transactional work of FOI/EIR, SAR and breach reporting referred to above, the IG team are involved in multiple strategic groups/projects as set out below. By engaging IG at the outset, we can ensure that IG is embedded initially rather than as an afterthought at the end of a project. These safeguard the Council in relation to any adverse Information Governance repercussions, which demonstrates the councils ongoing commitment to privacy by design.

Leadership Working
It is nearly two years since the approach and delivery of the Strategic Information Governance function changed whereby each leadership team was allocated a dedicated IG Technical Specialist officer. Although attendance at quarterly meetings was paused in the latter part of the year (Q2 & Q3) to support the transactional team, this way of working continues to yield positive results. This has been evident through earlier engagement with IG, improved awareness raising on IG matters across all areas, and effective relationships being forged with more collaborative working.

This way of working will continue and will be fine-tuned for further efficiencies and effectiveness throughout the forthcoming year to ensure best practice and to achieve compliance across all service areas. Reset and refocus sessions have already been planned with leadership teams for the end of year/early quarter one of 2022-23, with the aim being to review priorities, identify any gaps in compliance and to reset individual IG work programmes with each area.

Key successes
- Adults Eclipse Programme – early IG engagement has resulted in good privacy by design which has allowed for data quality and retention management being built into the system in the initial stages, thus reducing the need for any costly reactive and duplicated activities.
- Membership of Children and Adult's Transformation Boards – this gives IG strategic insight to road maps and forward planning activities so that IG roadmaps and strategies can be aligned accordingly.
- Overall early engagement with information Governance; evident through early consultation on privacy notices, data protection impact assessments and information sharing agreements.

Next Steps
- Continue to have more sight of leadership road maps so that we can forward plan accordingly.
- Attending other leadership transformation boards or equivalent.
- Continue working with leadership teams on current priorities identified earlier in the year.

Information Governance Board

Half yearly progress updates continue to be presented to the Information Governance Board (IGB) since it transitioned from a standalone meeting to being part of the Council's Strategic SEB function two years earlier. IG progress reports are scheduled quarterly (virtually) with the end of year and six-monthly reports being presented to the Board.

	Board Approvals/Decisions 2021-2022	Date approved
	Reset of FOI deadlines to the original 20-day period following the end of the pandemic	27 July 2021
	Approval of new three-tier IG training strategy	27 July 2021
	Funding for additional 12-month post to support the transactional IG function -approved	24 January 2022
	Approval of new policy framework and rationalised IG policies	19 February 2022

Project Contribution and Support

The following provides a list of the key priority projects/initiatives where IG input was required to support the Council corporately, at Leadership level and at citywide multi-agency groups:

- Collaborative working with Digital & IT - to review cyber risks and technical measures put in place to protect personal and other sensitive information
- Collaborative working with Data & Analytics (Insight & Performance) – this is a newly established working group to review the information governance implications of the data processing work that is being undertaken
- Youth Unemployment 18-24 – attendance and contribution to both the working meetings with DWP and the Project Board; provide IG support particularly on the legal basis for processing data for the purposes of the project and information sharing with DWP partners. Providing IG support on the delivery of the City Ideas fund linked to this programme
- Social Worker In Schools – ongoing IG support for the scheme
- Eclipse Adults Project continued support via record retention and process decisions regarding appropriate use and access of personal and special category data
- Adults and Children's Privacy Notice review in light of service changes and legislative updates to include information for service users on their data rights for secondary use of health and social care data (links into DSPT standard)
- Support on governance issues around the use of innovative technology to support Adult Health and Social Care out in the community using "Internet of Things" devices
- Working with Public Health and Social Care on the Covid Control of Patient Information (COPI) notice expiry - planning work for data retention/anonymisation
- IG support on the Ignite project; IG support on the Commonwealth Games project – contributing to the Finance working group
- IG Support and stakeholder contribution to Traded Services programme board.
- Respond to specific requests for support in relation to information governance queries such as Data Protection Impact Assessments; Information Sharing Agreements; Information incidents and Records Management
- Lexcel assisting Legal to maintain accreditation
- Councillor Enquiry Portal
- Advice on Baseline Personal Security Standard (PBSS) checks to enable continued access to DWP data
- Scanning Project – IG has greatly contributed to the procurement and tendering process and operational initiatives to ensure compliance with legal admissibility standards
- Collaborative working with our local and regional health partners - Participation in the Place Based Partnership (PBP) One Wolverhampton Governance and Informatics group

and the Black Country and West Birmingham IG group. Access to the Health Information Sharing Gateway was achieved earlier in the year which means the Council will now be able to use the gateway to share information with health agencies local and nationally through this channel.

Following the matrix work undertaken during the pandemic and the IG team's involvement in this, it is felt that the profile of Information Governance and the IG team respectfully is still raised, evidence through earlier engagement on project and initiatives.

Training

As outlined in the last SIRO report, the main focus for training this last year was on increasing the level of take up of the mandatory Information Governance e-learning training to the ICO and Data Security and Protection Toolkit (DSPT) target of 95% or above by the end of September 2021. This was achieved through the development of a targeted action plan working with the Data and Analytics team and the Operational Development team and through a key communication drive at leadership teams. Whilst the standard was obtained at that point in time, more monitoring by managers and more robust reporting is required to ensure the compliance target level is consistent throughout the year.

It has been recognised that training and awareness raising of IG is paramount when reducing information risk, as a result, a new training strategy was developed and approved by IGB earlier in the year. Although there has been a delay in progressing this due to the resourcing issues already outlined, the priority focus for this year remains to implement role-based IG training to across the council and to link it back to the level-two procedure documents that are being written as part of the new IG policy framework.

In addition to the above, the team have also continued to provide targeted training to service areas as and when required, including the delivery of a training seminar to the Legal team in February at the request of a lead lawyer; supported the Councillor induction programme by running virtual IG training sessions; provided both classroom and virtual IG training sessions for schools who have bought in to our IG traded.

Action for SIRO

- To receive regular updates on training figures and to champion/support the work to increase the uptake of figures across all services, at executive level.

Information Governance Framework

Policy

In accordance with the IG Work plan, a review was undertaken of the current information governance policies and framework. The review identified that a complete ratification of policies was required, and this was successfully undertaken in January 2022 with 19 very detailed policies being replaced by five high level policy documents. In addition, a new tiered policy framework was identified and developed. The policies and the new tiered policy framework were approved at IGB in February and all five level-one policies are now live for both council employees and the public to access. The new policies will be underpinned by level-two procedure and guidance documents which will be completed during the next year; these will provide detailed, specific, thematic, and more technical guidance to employees.

Templates/privacy notices/forms

- Information Asset Registers (IARs) – template was updated to reflect the latest guidance issued from the regulator (ICO); these are now being rolled out across all services with the view to be reviewed and updated as part of the IG Work Plan for 2022-2023.
- Privacy Notices **–** the privacy notices for Adults and Children's services have been updated to include reference to section 251 secondary use of health and social care data and the National Opt. Out. As part of the IG work plan for 2022-2023 the Council's overarching privacy notice will be reviewed and updated for any legislative and operational changes.
- IG intranet – work has started on creating an IG intranet page for employees to use. This was delayed but initial discussions have now taken place with Digital & IT to agree the best way forward.

Information Governance – Traded Service

The IG team offer a traded service to schools and Wolverhampton Homes, in addition to supporting colleagues in the West Midland Pension Fund (WMPF).

For the financial year of 2021-2022, the Information Governance team continued to support a number of schools on various information governance offerings. The SLA continues to provide schools with exceptional value for money in terms of the offerings available and the level of knowledge and experience the team provides. As with the working model with leadership teams, each school benefits from having a dedicated lead and deputy from the IG team who can provide a tailored service with direct access to support.

This traded service is reviewed annually, work continues with the Schools Business and Support Service in terms of developing future combined SLA offerings with other services across the council and providing basic statutory support for LA lead schools. The current financial climate may have an impact on future business; our fees and charges and the offerings we provide may need to be reviewed with Finance and Schools Business Support.

Our traded service to Wolverhampton Homes (WH) continued with the team providing IG support on strategic elements such as DPIAs, Information Sharing Agreements and Data Processing Agreements, in addition to the transactional processing of WH freedom of information requests, SAR requests, third party disclosures and the management of WH information incidents. Initial discussions have taken place between the two Data Protection Officers (DPOs for the Council and WH) in the last quarter of the year to identify more collaborative working as DPOs and to undertake a review of the SLA. Due to resourcing issues encountered in the last year, the review of the IG and the City's Tenancy Management Organisations (TMOs) was postponed, however this will be picked up in the next year.

Day to Day work

We continue to provide advice and guidance on an ad hoc basis, review DPIAs, sharing agreements, data processing agreements, contracts, GDPR supplier self-assessments, and privacy notices (list not exhaustive), as and when required.

Information Governance Risks 2021-2022

Due to the implications of non-compliance such as potential financial penalties, regulatory activity and reputational damage, the Council considers there to be sufficient risk around Information Governance that warrants regular monitoring and reporting through the Council's Strategic Risk Register.

As at July 2022, the following entry exists for information governance based around operational and technical measures. The entry is closely monitored each quarter with the council's Internal Audit team and is currently scored as Amber 6 with the aim of continuing the downwards movement towards the target score of Green 4.

The below table is a snippet of the entry in Strategic Risk Register for July 2022:

Risk Ref	Risk title and description	Our City Our Plan	Previous Risk Score	Current Risk and Target Score	Direction of Travel	Update position and further actions to take to mitigate risks	Sources of Assurance
10	**Information Governance** If the Council does not put in place appropriate policies, procedures and technologies to ensure the handling and protection of its data is undertaken in a secure manner and consistent with relevant legislation then it may be subject to regulatory action, financial penalties, reputational damage and the loss of confidential information. **Risk Owner: David Pattison** **Cabinet Member: Cllr P Brookfield**	Our Council	6 Amber	6 Amber Target 4 Green	↔	Five newly approved level-1 IG policies were being rolled out to employees during May 22. A review of the internal procedures and guidance documents (level 2) that underpin the new polices continues, with rollout being incremental between now and September 2022. Mandatory training levels (level 1) continue to be monitored through quarterly leadership team updates; a refresh and reset of IG priorities within each leadership area has commenced to maintain compliance at service level. Meetings between the Caldicott Guardian (CG) and the Data Protection Officer (DPO) have recommenced and are scheduled quarterly to provide an update on performance in key areas such as information requests, breaches and training for teams falling under the Caldicott function and to discuss any potential or current risks identified within Caldicott linked projects so that they are flagged to the CG and mitigating actions agreed. Key corporate projects continue to be supported to ensure IG compliance and to ensure privacy by design is initiated in a timely manner. Collaborative working between IG and Digital and IT continues to maintain technical and cyber compliance and to mitigate associated risks; collaborative work has commenced between IG and Data & Analytics with monthly meetings scheduled. Information incidents reported during the period have been contained, investigated with mitigating actions put in place locally with relevant teams. An additional temporary resource has been successfully recruited and will support the IG team for a 12-month period in terms of the delivery of statutory functions and work programme activities. **Further actions to take to mitigate risk** • Continue to progress the review and creation of level two procedures and guidance to support level one policies • Progress the development and rollout of Level 2 and level 3 training for specialist roles • Progress the collaboration with Audit Services to support the DPO reporting function and ongoing corporate compliance assurance.	E-learning take up and ongoing training development Privacy by design – DPIA, IG Impact Assessments Quarterly updates and regular touch points with Leadership teams Robust breach management procedures in place with assessment and monitoring at service level (leadership feedback) SEB/IG Board and Caldicott function to continue to monitor, challenge, support and champion IG compliance initiatives

IG Work Plan 2022-2023

Table 3.0 below highlights the key priorities from the full IG work plan for next year 2022-23.

Table 3.0 Summary workplan 22/23

Priority work activities		Period 2022-2023
Information Asset Registers	Continue to review and consolidate IARs with the updated template with leadership teams; review ownership and update disposal schedules accordingly.	All year
Training	• Rationalise IG training - formulate and introduce level two and three role-based training; introduce scheduled themed/topic training; scheduled e-bytes; drop-in sessions and surgeries. • Closely monitor uptake of level 1 mandatory e-learning training throughout the year. Collaborative work with Digital & Analytics and Operational Development to build a robust monitoring mechanism. Reports to be presented at quarterly leadership meetings.	C/F Quarter 2 to Quarter 4 Quarter 1 to Quarter 4
Policies	Focus on completion and rollout of level two procedure guidance document for employees to support the new IG policy framework now in place.	Quarter 2
IG intranet	Development and completion of IG intranet pages; digitalise forms and templates and include a repository for DPIAs, ISAs, PNs and IG level two procedure documents.	All year
Records Management	• Programme of work to be developed covering digital continuity, records retention and system migration which is linked to the risk highlighted. Potential programme approval to be sought from IGB once developed. • Programme delivery and communication.	Quarter 2 2022/23 - 2023/24
Information Sharing	• Review non health and care related information sharing framework and associated agreements. • ISA review and rationalisation.	Quarter 3 to Quarter 4

Priority work activities		Period 2022-2023
Traded Services	Continued service provisions.	All year
	Review of SLAs with WH; review CWC and TMO relationship (IG).	Quarter 3
Collaborative working	Further develop collaborative working programmes with Data & Analytics, Digital and IT, Operational Development aligning road maps and strategies.	All year

Action Log for SIRO 2021-2022

Date raised	Action	Outcome	Status
July 2021	To review and agree a decision on when the time extension on FOI requests can revert to the statutory deadline of 20 days. This was approved and actioned in September 2021.	Following approval by SIRO, the deadline was reverted to the statutory timeline as of September 2021.	Approved/Closed
January 2022	Approval of resource for transactional IG team to ensure statutory functions are not compromised and mitigate the risk of a negative domino effect on strategic IG.	Approved in January 2022 and position recruited and resource in post as of May 2022. Capacity situation will be monitored and brought back to SIRO as applicable.	Approved/Closed
July 2022	To receive regular updates on training figures and to champion/support the work to increase the uptake of figures across all services, at executive level.	In progress.	Raised/Open

A glossary of terms

Assurance
A confident assertion, based on sufficient, relevant and reliable evidence, that something is satisfactory, with the aim of giving comfort to the recipient. The basis of the assurance will be set out and it may be qualified if full comfort cannot be given.

COPI (Control of Patient Information) Notice
The Secretary of State for Health and Social Care has issued NHS Digital with a Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI) to require NHS Digital to share confidential patient information with organisations entitled to process this under COPI for COVID-19 purposes.

DPO
Data Protection Officer is a statutory role as mandated by the UK General Data Protection Regulations and the Data Protection Act 2018. All organisations who process personal/sensitive data must have this role in place to oversee an organisation's data protection strategy and implementation. They are the officer that ensures that an organization is complying with data protection requirements.

DSPT
The Data Security and Protection Toolkit is an online self-assessment tool that allows organisations to measure their performance against the National Data Guardian's 10 data security standards. All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance that they are practising good data security and that personal information is handled correctly.

Governance
The arrangements in place to ensure that the Council fulfils its overall purpose, achieves its intended outcomes for citizens and service users and operates in an economical, effective, efficient and ethical manner.

ICO
The Information Commissioner Office, the supervisory authority responsible for overseeing Data Protection and Freedom of Information in the UK.

IGB
The governance group charged with carrying out assurance work and implementing and monitoring IG controls across the organisation.

Risk Management
A logical and systematic method of establishing the context, identifying, analysing, evaluating, treating, monitoring and communicating the risks associated with any activity, function or process in a way that will enable the organisation to minimise losses and maximise opportunities.

SIRO
The Senior Information Risk Owner is a member of the Senior Executive Board with overall responsibility for an organisation's information risk policy. The SIRO is accountable and responsible for information risk across the organisation.

SEB
The Councils Senior Management Board.

Appendix 1

Information Governance Annual Statistics 2021-2022