City of Wolverhampton Council

2022 - 2023 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.

Despite a challenging year in terms of resource capacity across the wider service function and seemingly increased demand both internal and external, the Information Governance (IG) team has continued to maintain its exemplary eight-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 2023-2024, with some reset and refocus of priorities with each individual leadership areas 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 2023- 2024 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. Residual work plan activities from the previous year, such as the delivery of role-based training for specialist roles will be completed as will the finalisation and publication of the four remaining ICT related procedure documents. Mandatory training uptake will continue to be monitored using the newly developed training dashboards and emphasis will be placed on managers to ensure compliance is maintained throughout the year for their teams. Focus will continue in terms of the council's approach to records management and digital document retention, with Audits being scheduled throughout the year with Internal Audit to assess the risk across the business. Collaborative working with key internal colleagues will continue to deliver consistent aligned strategic objectives; an area of focus for this year will be on the supply chain processes and mitigation of risks in this area - work with Procurement and Legal colleagues will be paramount in this. Another key priority on the IG work plan for the next year will be the review of the city-wide information sharing framework – findings and prospective proposals will be presented to the IG Board for approval during the year.

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 2022/23 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 - 2022 to 2023

Statute	Number received/reported	% Requests responded on time	Escalated to ICO
Disclosures and Subject access requests under DPA	242 (SAR) + 572 (Disc) = 814	98.7%	0
FOI	1234	96.6%	3 from 13 Internal reviews
Information Incidents under DPA	89	N/A	2 (voluntary)
Total	**2136**	**N/A**	**5**

Volumes have remained fairly static since last year, with only 87 more requests being received in total. It is pleasing to note that only 1.05% of all FOI requests generated a statutory internal review and that that 97.4% of all information requests (FOI & SAR) were responded to within the statutory timeframe. Of the 2136 instances referred in the above table only five (<0.1%) were escalated to the ICO; these were two voluntarily reported information incidents in consultation with the SIRO and the DPO and three were challenges to internal reviews issued by the Council. None of these generated any decision notice or financial penalty from the ICO.

Please see **appendix 2** for a summary of annual performance for 2022-2023 and against previous years. It is pleasing to report that overall performance compared to last year has increased by 3% (94.4%) and is now back in line with the performance levels of previous years; indicating that remedial measures put in place have been successful.

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	117	9.5
Section 43 - Commercial interests	22	1.8
Section 31 – Law Enforcement	15	1.2
Service Area – top three volumes received - FOI	**No.**	**%**
City Environment	312	25
Finance	177	14
Governance	116	9
Service Area – top three volumes received - SAR	**No.**	**%**
Children's Services	66	27
Adult Services	48	20
City Assets and Housing (All for W'Ton Homes)	36	15
Service Area – top three volumes received - Disclosures	**No.**	**%**
City Environment	239	42
Finance	197	34
Education and Skills	72	13
Requestor Type – top three - All	**No.**	**%**
Public	1416	69.5
Organisations	338	16.5
Media	160	7.8

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

The same top three exemption types were applied this year. Likewise, excluding Governance, the same directorates featured in the top three for the different disclosure types.
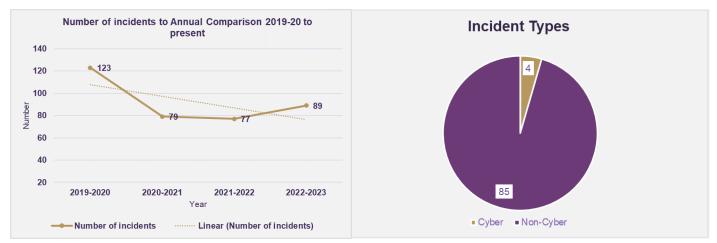
Currently 9.5% of all incoming FOI requests have been answered as the information requested is already available; this is an increase from last year's figure of 7.9%. If more information is made available on-line, then the Council will be able to refer requests to these data sets as opposed to processing requests through teams and service areas. With a few years of data available now to analyse, it is apparent from the previous year comparisons that most of the

requests are made to the same directorates; future work should therefore focus on these top three directorates to identify what datasets could be proactively published. This can be picked up in the collaborative working between Information Governance and Data Analytics, which has already begun for the year, to identify if there are recurring themes within the top three directorates receiving the bulk of requests and to determine the feasibility of making additional data sets available to the public.

As per previous years, and 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 public continue to make the most requests for information with 68.5% of requests being made by them last year. However, this is limited by the information provided to us and recorded on our case management system, 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 2022-2023 (89) is slightly higher than the previous year 2021-2022 (77). As in previous years the main issue remains communications (physical and email) being sent to the wrong recipient, this error accounts for 84% of all breaches reported.

Whilst this risk can never be eliminated due to human error, mitigating actions continually take place to reduce this – such as targeted training, raising awareness and follow up action through incident reporting feedback. In addition, actual or potential incidents, whether isolated or a perceived theme, continue to be reported and discussed at individual Leadership team meetings, to identify learns and put in place any necessary action.

On review of the two cases that were voluntary reported to the ICO, one revolved around an inappropriate disclosure being made due to a failure in process and the other was a failure to use the BCC (Blind Carbon Copy) function as opposed to CC (Carbon Copy) function – a similar

breach reported to the ICO in a previous year. Neither of these generated any decision notice or financial penalty from the ICO.

Third Party Breaches

Interestingly this year, two of our suppliers have reported cyber-attacks, with both suppliers reporting the incidents to the ICO directly. In both incidents, Council data has not been affected in terms of individual's data being compromised and/or the individual being placed at risk.

Associated Risks and Considerations in relation to statutory and regulatory activities

The overall performance on FOI and SAR/DP requests for 2022-2023 has increased from 94.4% to 97.4%, indicating that the remedial actions (additional resource) put in place has had the desired positive effect on performance for the year.

It is worth noting that a new complaints case management system was procured at the end of quarter four of this year and will be implemented in late Summer. In preparation for this, as of April 2023, all case officers have been undertaking both the transactional complaints work as well as the transactional information governance work and will be involved in the testing and implementation of the system. As a result, performance will be closely monitored to ensure that there is minimal impact on performance during this transitional period on both statutory information requests and statutory complaints.

Compliance Actions
For 2022-2023 the Council undertook the following compliance actions:

Standard/Compliance	Comments and Actions
Data Security and Protection Toolkit (DSPT)	This was successfully submitted before the annual deadline of 30 June 2023. No areas of concern were raised or reported for this submission.
Cyber Essentials Plus	This area of work is undertaken by Digital and IT but does feed into DSPT. Cyber Essentials Plus accreditation was achieved in July 2020 and was renewed in December 2022. Recertification is due in December 2023.
Public Services Network (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 2023. Recertification is due from 1 March 2024
LEXCEL	The IG team assisted with Legal Services to ensure ongoing compliance with GDPR for their annual accreditation with LEXCEL.

IG Work Undertaken in 2022-2023

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
Leadership working continues with each leadership team having a dedicated strategic information governance lead responsible for supporting the area on all matters of IG.

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
- Ongoing support on complex cross-cutting type projects across the business - 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.
- Continued 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.
- Collaborative working both Data and Analytics – the benefits of working together have been evidenced from both sides – early engagement and consultation leading to early consideration of IG impact and reduction of risk; development of dashboards to support the team's internal statutory processes.

Next Steps
- Revive working relationships with other services – such as Legal and Procurement; have more sight of their strategic road maps so that we can forward plan accordingly.
- Expand our membership to other transformation boards or similar across the wider business, particularly those outside of the Children and Families arena.

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. Where adhoc reports or requests for a decision/approval need to be presented to the IG progress reports, these are scheduled as and when required during the year. For this reporting period, there were no decisions or approvals presented to the Board.

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

- Draft Acceptable Use and Bring Your Own Device (BYOD) policies as part of Digital and IT's cyber security action plan
- Advice and support on revisions to the Council's social media policy
- Advice and support in respect of the use of Google Analytics 4 (GA4)
- Advice and support for Omnichannel – multi-channel contact centre software replacement project
- Collaborative working with Data & Analytics– increased collaborative work has taken place this year, both on internal initiatives and external. It is anticipated this will continue with strategic objectives being aligned for more effective joined up working and benefit to the business.
- 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
- Eclipse Adults Project continued IG support both at operational and strategic group level through to go live.
- 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 Education on the creation of a City-wide Information Sharing Agreement for all schools in the borough and the City Council
- Working with the Families theme on the creation of Family Hubs within the City
- Provide support on the Reducing Repeat Referrals programme within Children Services
- Assisting Supporting Families and data sharing across the Council and with its partners
- Offering IG support to the Holiday Activities Fund
- IG Assistance to the Low Income Family Tracker (LIFT) project
- IG Support and stakeholder contribution to Traded Services programme board.
- Advice and support to Rent with Confidence re-launch project and website
- Advice and support as part of the development of the new Employee Risk Alert System that is replacing the Potentially Violent Persons Register (PVPR)
- Lexcel assisting Legal to maintain accreditation
- Advice on PBSS (DBS) checks to enable continued access to DWP data
- Advice and support to Council Tax in respect of the Government's Energy Bill Support Scheme
- Scanning Project –continued support on 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 (Shared Care Record).
- IG Support on implementation of health monitors in CWC libraries
- IG support on and contribution to the mid and long term objectives of the Housing strategy, delivered in partnership with the Council and Wolverhampton Homes.
- 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

In addition to the projects that the Information Governance team support and contribute to, IG is also represented at the Council's Project Assurance Group (PAG) to ensure that all projects and programmes that come through the group, which are undertaken by the Council, are assessed for information governance related risks and issues at initiation stage.

Training

It is a requirement of the Data Security and Protection Toolkit (DSPT) and the ICO that mandatory training is undertaken by all members of staff who deal with personal data and that a target take-up of 95% or more is achieved across the Council at any one time.

To effectively manage this, a training dashboard has been developed with colleagues from Data and Analytics which provides for a more accurate, robust and less manual means of monitoring the take up of mandatory information governance training than in previous years. The dashboard has been implemented by the team and is being used currently in pilot to report on individual leadership areas. Going forward, once finalised, the dashboard can be provided to Heads of Services and Managers to directly access and monitor their individual area/team progress. This tool will enable them to ensure the compliance target level is consistent throughout the year.

A new role-based IG training strategy was approved last year, and work has initiated on this. Modules have been reviewed and finalised for all levels and once a suitable monitoring process has been agreed and put in place, this new training framework can be implemented.

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 supported the Councillor induction programme by running face to face IG training sessions; provided both classroom and virtual IG training sessions for schools who have bought in to our IG traded.

Information Governance Framework

Policy

In accordance with the IG Work plan of the previous year, 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 2021 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 five new policies have been in place now for 18 months and will soon be due for their first review in February 2024. In addition, 22 out of the 26 level two procedure documents that provide detailed, specific, thematic, and more technical guidance to employees, and which underpin the new policies, were published on the council intranet for all employees to access. The four remaining procedure documents that are outstanding are linked to key pieces of work being developed with Digital and IT and will be progressed and published in the next year.

Templates/privacy notices/forms – completed and pipeline
- Data Protection Impact Assessments (DPIAs) – we continue to support the business on the completion of DPIAs and shorter IG Impact Assessments. Screening continues to take place through the "starting a procurement" process which ensures that privacy by design and information risks are considered from the outset. A review of the process will be scheduled as part of the IG work programme, to ensure that the process remains current and fit for purpose.
- As part of the IG work plan for 2023-2024 the Council's overarching privacy notice will be reviewed and updated for any legislative and operational changes.

- IG intranet – basic information such as team structure, key templates and policies have been published on the Information Governance section of the Governance portal/intranet. This is an interim position and work has re-started on creating a specific IG intranet page for employees to use.
- A dashboard is being developed for the monitoring of data breaches; this includes the creation of an electronic form that employees can use when reporting an information incident/data breach which will link directly to the dashboard and thus reducing manual input. Both the form and dashboard are currently being tested and it is anticipated these will go live in the year.
- A review of the city's MASH information sharing agreement has commenced. In addition, a review of the citywide three-tier Information Sharing Framework (lead by the Council) has also started and a proposal on approach will be present to the IG Board at a future date.

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 2022-2023, 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. The working model is the same as the model with leadership teams, in that 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, both financially and operationally, and 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.

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.

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 2022-2023

The following risks have been scored with the following matrix that is used across the Council for risk management as well as for scoring of breaches.

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 of July 2023, 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.

The below table is a snippet of the entry in Strategic Risk Register for July 2023:

| 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 | ⬌ | Work on the IG Policy Framework has progressed - 26 internal procedure and guidance documents that underpin the policies have been written and are live for employees to access. Mandatory training levels are being monitored; a new dashboard has been produced with support from Data & Analytics which will produce up to date statistics both on an adhoc basis and at individual Leadership teams in their scheduled quarterly update meetings. In addition, a new Data Breach management dashboard has also been developed and will be used from April 2023. This will provide more trend and targeted reporting of breaches. Collaborative working between IG and Digital and IT continues; a series of system demos have been viewed to support Cyber awareness raising across the council. Work continues cyber risk and compliance. Incidents reported during the period have been contained, investigated with mitigating actions put in place locally with relevant teams.

Further actions to mitigate risk:

• Continue to collaborate with Digital and IT to progress the implementation of the remaining level two procedures and guidance documents – a reset of meetings is being scheduled in July to align road maps and joint priorities for 23/24 | 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

A detailed annual report on Information Governance was taken to the Council's Governance and Ethics Committee in September 2023. |

Risk Ref	Risk title and description		Previous Risk Score	Current Risk and Target Score	Direction of Travel	Update position and further actions to take to mitigate risks	Sources of Assurance
						• Robustly monitor the mandatory training levels via new dashboard to ensure above 95% take up in any given period. Further discussion arranged with OD to finalise and rollout of Level 2 and level 3 training for specialist roles • Progress collaborative working; formulate and agree combined deliverables alignment with strategic roadmaps, particularly around the digital arena in relation to data and records management - Reset scheduled in July with Digital and IT; in addition, an element of records management will be picked up in the audit review scope too • Progress the collaboration with Audit Services to support the DPO reporting function and ongoing corporate compliance assurance – as at June 23 - work has been scoped with Audit and timeframes will be confirmed	

IG Work Plan 2023-2024

Table 3.0 below highlights the key priorities from the full IG work plan for 2023-2024.

Table 3.0 Summary workplan 2023-2024

Priority work activities		Period 2023-2024
Corporate IG Awareness Raising	Formulate a rolling Corporate communication and awareness plan to provide continuous updates to staff on key matters of IG throughout the year. To include: • routine updates on the IG climate (national and local themes) in relation to data protection, Freedom of Information, and information incidents etc. along with any required learning • key updates on activities/incidents within the cyber- security environment, closely linking in with Digital & IT's new cyber action plan	Quarter 2 – Quarter 4
Information Asset Registers	A comprehensive review of the methodology in maintaining and operating these registers will be undertaken to ensure that they remain compliant with the latest legislation while still being useful and relevant for service areas. This will involve going back to basics to identify the most core and statutory data sets required and the best methodology for updating, collecting and monitoring these registers.	All year
Supply chain – Due Diligence with Data Processors	• Review current internal processes around use of data processors/suppliers • Work collaboratively with Procurement and Legal to ensure processes and template agreements are rigorous and fit for challenge from the ICO • Present any radical changes to IG Board for approval • Communicate and implement the changes accordingly	Quarter 3 to Quarter 1 2024-2025

Priority work activities		Period 2023-2024
Policies	Develop and publish the outstanding ICT level two policies in relation to Cyber and Acceptable Use as well as Social Media policies.	Quarter 2 to Quarter 3
IG intranet	Further develop the IG intranet pages into a standalone repository for all IG related guidance and policies for the whole Council. This will incorporate IG and Customer Engagement as well appropriate dashboards as required.	All year
Information Sharing	- To finalise the review of: - MASH information sharing agreement - Wolverhampton Information Sharing Framework - Undertake a comprehensive review of the current city-wide framework - Present findings and proposals of any changes to IG Board for approval - Develop/update/create and new information sharing templates in accordance with findings (including the Wolverhampton Overarching Information Sharing Protocol (tier 1), tier 2 and tier 3 sharing templates - Finalise the School Information Sharing Agreement (Issued April 2023) - Continue working with Health partner to finalise any national and regional health ISAs - Create and update a CWC repository for all sharing agreements that are entered into	Quarter 2 to Quarter 4
Traded Services	- Continued service provisions - Review of SLAs with WH; review CWC and TMO relationship (IG) - Review of SLA provision for schools in light of financial situation and risk on future income	All year Quarter 3
Housing Strategy	Collaborate with WH, TMO, CWC Housing with the implementation of the Housing Strategy Action Plan (2023 – 2028)	All year

Priority work activities		Period 2023-2024
Collaborative working	Further develop collaborative working programmes with Data & Analytics, Digital and IT, Operational Development aligning road maps and strategies	All year

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 2

Information Governance Annual Statistics Info-graph 2022-2023

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Information Governance Annual Statistics Info-graph 2022-2023