

<b>DECISION-MAKER:</b>	GOVERNANCE COMMITTEE		
<b>SUBJECT:</b>	FREEDOM OF INFORMATION, DATA PROTECTION & REGULATION OF INVESTIGATORY POWERS ACTS: ANNUAL REVIEW 2021-22		
<b>DATE OF DECISION:</b>	26 <sup>th</sup> September 2022		
<b>REPORT OF:</b>	Director of Legal and Business Services		
<b><u>CONTACT DETAILS</u></b>			
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<b>Director</b>	<b>Name:</b>	RICHARD IVORY, DIRECTOR OF LEGAL AND BUSINESS SERVICES	<b>Tel:</b> 023 8083 2794
	<b>E-mail:</b>	<a href="mailto:Richard.ivory@southampton.gov.uk">Richard.ivory@southampton.gov.uk</a>	
<b>STATEMENT OF CONFIDENTIALITY</b>			
None			
<b>BRIEF SUMMARY</b>			
A report detailing the statistical information for the financial year 2021-22 with regard to information governance. This report details statistical information on requests received under the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations 2004 (EIR), the UK General Data Protection Regulation (GDPR) and the Council's activity under the Regulation of Investigatory Powers Act 2000 (RIPA).			
<b>RECOMMENDATIONS:</b>			
	(i)	To note and comment on the update of the statistical information for the year 1 <sup>st</sup> April 2021 – 31 <sup>st</sup> March 2022 relating to: <ul style="list-style-type: none"> <li>• FOIA and associated legislation</li> <li>• GDPR</li> <li>• RIPA 2000</li> </ul>	
	(ii)	To note the updated Corporate Surveillance Guidance document (August 2022) attached at appendix 1	
<b>REASONS FOR REPORT RECOMMENDATIONS</b>			
1.	To keep Members informed as to the impact of the legislation to the Council and to detail the form and type of information requests received in 2021-22.		
2.	To ensure that Members continue to be aware of the Council's statutory obligations and compliance performance.		

## ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

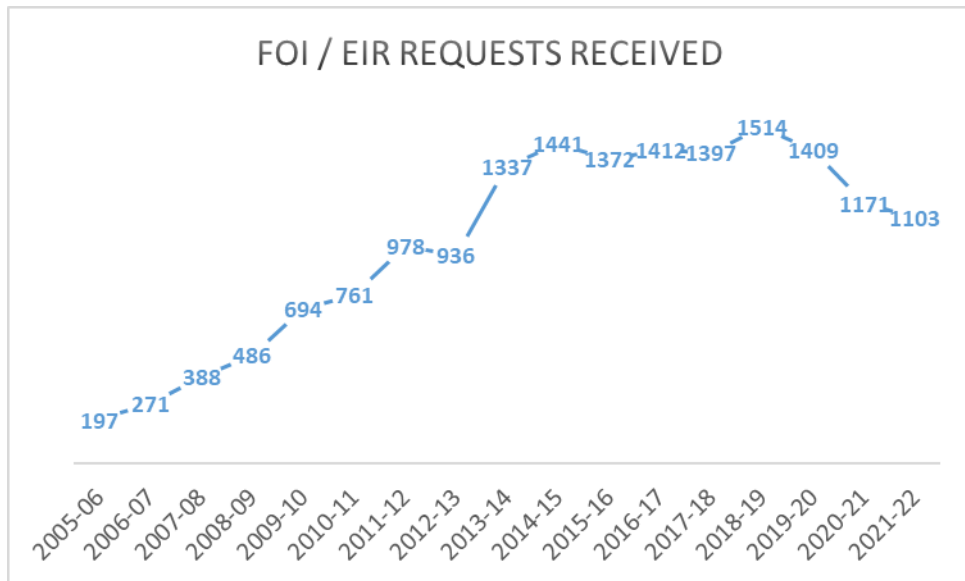
3. The alternative to bringing this report before members is to not report the yearly analysis. This was rejected because it is considered to be good governance to report such matters to Members, provides an audit trail to demonstrate to the Information Commissioner that the Council has a robust structure in place to comply with the legislation, and to maintain the profile of information law requirements and resource implication within the organisation.

### DETAIL (Including consultation carried out)

4. This report will be published on the Council's website
- FOIA**
5. FOIA and EIR gives separate rights to request information and environmental information from public authorities. Responses must be issued within 20 working days.
6. Under the FOIA and associated legislation, anybody may request information from a public authority with functions in England, Wales and/or Northern Ireland. Subject to exemptions, the FOIA confers two statutory rights on applicants:
- (i) The right to be told whether or not the public authority holds that information; and
  - (ii) The right to have that information communicated to them
7. There are two types of exemptions that may apply to requests for information – absolute and qualified.
8. Information that falls into a particular exemption category, for example information relating to commercial interests, will have to be disclosed unless it can be successfully argued that the public interest in withholding it is greater than the public interest in releasing it.  
Such exemptions are known as qualified exemptions.
9. Where information falls within the terms of an absolute exemption, for example, information reasonably accessible by other means or information contained in court records, a public authority may withhold the information without considering any public interest arguments.
10. For 2021-22, the Council received 1103 requests, broken down as follows:

Total Requests	FOI Requests	EIR Requests
1103	898	205

11. This represents a drop in previous years, which can still be attributed to the COVID-19 pandemic.



This is supported by the number of requests received since April 2022, which is approximately a 16% increase on the 2021-22 figures.

12. The Directorate breakdown of the requests is as follows:

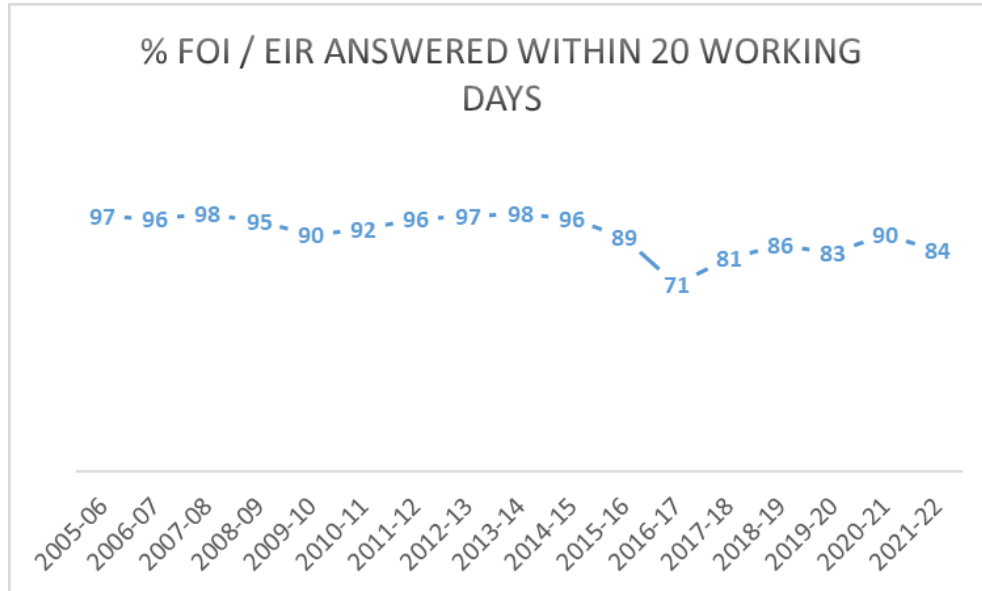
Directorate	No. Rec'd	Responded On Time	Responded Late	Av. Days Taken
Communities, Culture, and Homes	284	91%	9%	13
Place	278	85%	15%	17
Wellbeing (Children and Learning)	194	71%	29%	25
Finance	135	91%	9%	11
Business Services	111	82%	18%	18
Wellbeing (Health and Adults)	99	83%	17%	17
Not allocated to Directorate	2	N/A	N/A	N/A
<b>Grand Total</b>	<b>1103</b>	<b>84%</b>	<b>16%</b>	<b>17</b>

Compliance is calculated from the requests *responded to* within the year. This may include requests *received* in the previous year.

Requests are not allocated to a directorate when it is not clear what information is sought from the request. Clarification is requested, and if this is not received within 3 months, the request is deemed to be lapsed.

13. During the year, 84% of all monitored FOI and EIR requests were responded to with within the statutory deadline of 20 working days. This is a decrease on the previous year, most likely due to the Council still prioritising its pandemic response.

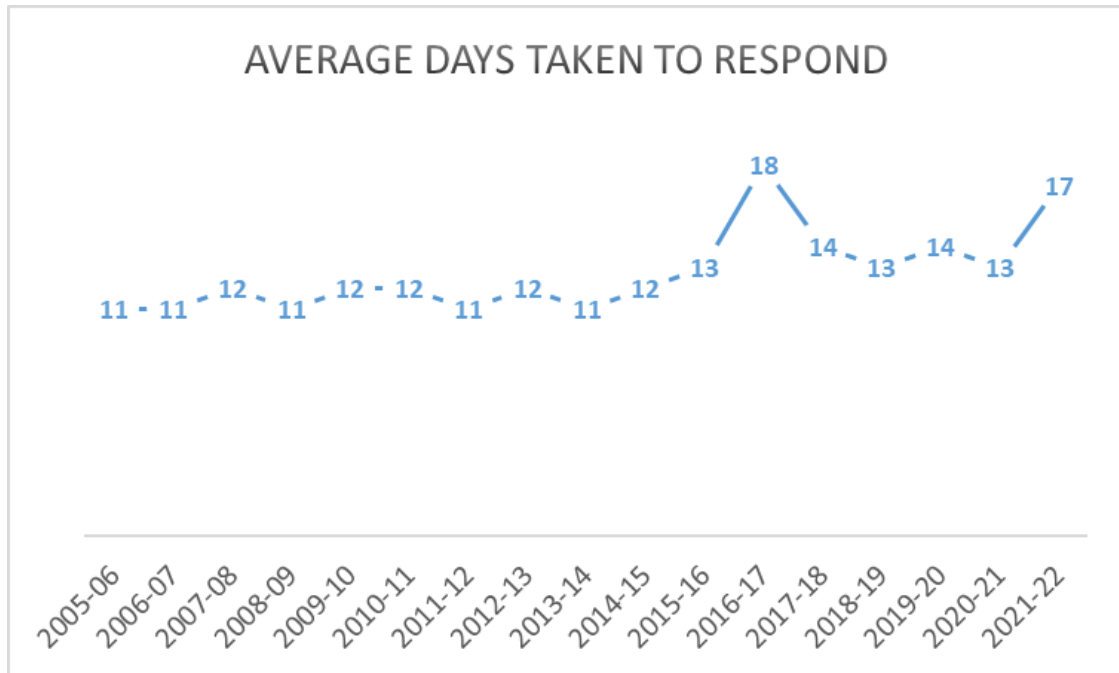
The Council's target rate for responses is 90%.



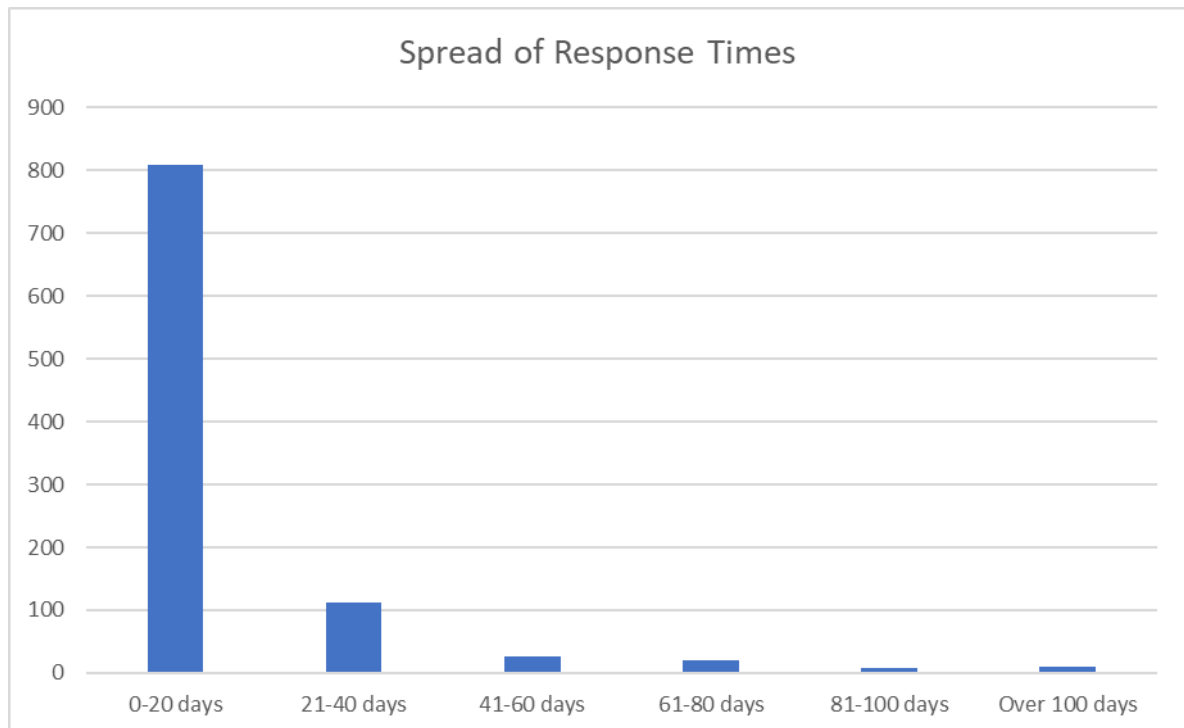
14. Reasons why a request might not be answered within the statutory timeframe are as follows:

- Requests not being referred to the Corporate Legal team when received by the service area
- Service areas experiencing high workloads for other statutory services, that have a higher priority.
- Requests being initially allocated to the incorrect service area, and this does not become apparent until near the end of the deadline.
- Human / administrative errors.
- The complexity of the request – for example, if there are a large number of components to the response that need to be compiled to respond in full, but a costs limits/staff time exemption can't be applied, more than one exemption needs to be applied, or a large amount of redaction is required (this can't be considered in the costs limits).
- The request contains inaccuracies - for example, if a response is initially sent out on time but is later identified to contain errors, a revised response should be sent and it is likely that such instances will take us past the deadlines.
- Staff absence, particularly if the service area holding the data is a small team, or the request needs approval from a particular individual
- Representations are sought from third parties regarding the request (e.g. those that might have commercial interests in the data being released).

15. The average days taken to respond has increased to 17 days, which represents the second highest average since the FOIA came into force.



16. However, the vast majority of requests were responded to within the 20-working day period:



17. Reasons for delays in the requests that exceeded 100 days included:

- Service areas failing to respond within the initial timeframe, and the majority of their engagement with the requests coming after the deadline date. This was the case for most of the requests that went this late last year.
- Inaccuracies in the data initially sent to the requester, meaning that a revised response was required.
- Workloads and staffing issues within the service areas, notably Children’s Services

For the other requests that went overdue, there were more varied reasons. For example, Corporate Legal identified an issue with Outlook incorrectly determining several email requests coming into the FOI inbox as “spam”, which were then placed in the junk folder. However, the mail filter settings have since been reconfigured, and a process has been put in place to ensure the junk mail folder is checked regularly.

Corporate Legal has also introduced a new escalation process, where the relevant Information Asset Owners and Administrators (Division and Service Heads) are copied into correspondence regarding requests that may miss the statutory deadline unless urgent action is taken.

18. Under FOIA, where the cost of responding to the request will exceed the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (which is currently set at £450 for local authorities), the Council may refuse to comply with it. For 2021-22, the Council issued 69 Refusal Notices on fees grounds, which represents an increase, with 58 being issued last year.

19. When applying the fees exemption, the service area looks at the amount of time it would take to locate the information sought. If the fee limit is exceeded, it is usually because individual records or files have to be searched (i.e. the information requested doesn’t form part of a reportable field). The service area would be asked to do a sample search, which would give the Council an estimate / average time, which is then used to calculate the total time. E.g. if searching one file would take 5 minutes on average, searching 250 files would take 1250 minutes, which equates to 20.8 hours (and over the 18 hour fee limit). Each “item” requested needs to be looked at separately, however, which is why the Council might issue a partial response (some of the information can be disclosed within 18 hours, and some cannot).

20. The breakdown of the request outcomes is as follows:

Outcome	No. of Requests
Fully Answered	824
Refused or Part Refused	101
Lapsed or Withdrawn	173

As of drafting this report, there are currently 5 active FOI requests received in 2021-22.

	<p>Fully answered requests include those where information is not held, or an exemption has been applied. This would still be classed as being fully answered.</p> <p>Refused or part-refused requests are where the request has been refused in its entirety, or only certain elements have been refused (e.g. on cost grounds). Other reasons for refusal will be because the request is vexatious or repetitive in nature.</p> <p>Lapsed or withdrawn requests are where the requester has actively withdrawn their request, or has not come back with clarification when asked within 3 months.</p>																						
21.	11 individuals requested internal reviews regarding decisions made to withhold, partially withhold information requested, or where they were generally unhappy with how their request was handled.																						
22.	<p>The themes of the internal reviews were as follows:</p> <ul style="list-style-type: none"> <li>• The requester was unhappy that their request has been deemed to be vexatious</li> <li>• The requester was unhappy with the request being refused on the grounds of cost (i.e. they were not satisfied with the Council's estimate)</li> <li>• The requester was unhappy with the Council's application of an exemption to withhold information (e.g. commercial interests).</li> <li>• The requester was not satisfied that all information within scope of their request had been provided.</li> </ul>																						
23.	This year, 1 appeal was made to the ICO as a result of the Council's decision in respect of their internal review. This appeal is still ongoing, but is in relation to a late request, where the requester was not satisfied that a full response was received.																						
24.	<p>As with all years, types of requests have been varied and covered every service area of the Council, including budget, HR, council tax and business rates data, schools, highways maintenance, and social services.</p> <p>The top ten request subjects ranked in order of popularity are as follows:</p> <table border="1"> <thead> <tr> <th>Service Area</th> <th>No.</th> </tr> </thead> <tbody> <tr> <td>Schools and Education</td> <td>49</td> </tr> <tr> <td>Council and community housing</td> <td>47</td> </tr> <tr> <td>Parking</td> <td>43</td> </tr> <tr> <td>Children and young people social care</td> <td>38</td> </tr> <tr> <td>Procurement</td> <td>38</td> </tr> <tr> <td>Environmental health</td> <td>34</td> </tr> <tr> <td>Human resources</td> <td>33</td> </tr> <tr> <td>Highways</td> <td>32</td> </tr> <tr> <td>Highway maintenance</td> <td>30</td> </tr> <tr> <td>Information communication technology</td> <td>28</td> </tr> </tbody> </table>	Service Area	No.	Schools and Education	49	Council and community housing	47	Parking	43	Children and young people social care	38	Procurement	38	Environmental health	34	Human resources	33	Highways	32	Highway maintenance	30	Information communication technology	28
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25.	<p>The breakdown of requester type is as follows:</p> <table border="1" data-bbox="247 280 1460 515"> <thead> <tr> <th data-bbox="247 280 853 324">Requester Category</th> <th data-bbox="853 280 1460 324">% of Requests</th> </tr> </thead> <tbody> <tr> <td data-bbox="247 324 853 369">Private Citizens</td> <td data-bbox="853 324 1460 369">60%</td> </tr> <tr> <td data-bbox="247 369 853 414">Companies / Businesses</td> <td data-bbox="853 369 1460 414">19%</td> </tr> <tr> <td data-bbox="247 414 853 459">Media</td> <td data-bbox="853 414 1460 459">11%</td> </tr> <tr> <td data-bbox="247 459 853 515">Remainder</td> <td data-bbox="853 459 1460 515">10%</td> </tr> </tbody> </table> <p>The remaining requests came from a combination of charities, students, researchers, lobby groups, MPs / Members and other Councils etc.</p>	Requester Category	% of Requests	Private Citizens	60%	Companies / Businesses	19%	Media	11%	Remainder	10%
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26.	<p>Previously, Members requested information as to how much time and resources each Service spends on dealing with requests. Research from Parliamentary post-legislative scrutiny of the Act indicates “the best-performing local authorities took between 1 and 6 hours for each request”. We can estimate that our time spend on requests is comparable to this and using the £25 per hour rate that the Act allows us to charge for staff time when refusing requests, we can estimate that each request costs the Council between £25 and £150 to respond on average.</p>										
27.	<p>As Corporate Legal accurately time-record, we are able to detail how much time it takes to log, monitor, and give advice on requests. For 2021-22, the total time the Corporate Legal team spent dealing with FOI / EIR requests was 1052 hours, meaning the average time taken per request was just under 1 hour. Most requests (around 58%) take around half an hour to action within the Corporate Legal Team but, where detailed exemptions and redactions are needed, this can increase time taken on a single request for very complex cases.</p> <p>For example, the Corporate Legal time spent just over 20 hours on one single request in 2021-22. The average therefore predominantly represents the time taken for detailed application of legal tests to requests where the Council seeks to withhold certain information from release.</p>										
28.	<p>It should be stressed that this figure does not include the time taken for Business Support or the service areas to locate, collate, and send out the information requested and the Council does not have a mechanism for capturing that resource cost (which comprises the bulk of any cost to the Council).</p>										
29.	<p>In the Corporate Legal team there are now 3 FTE member of staff dedicated to providing advice and monitoring compliance with information law. Other members of Legal Services and apprentices support this function when their capacity allows it. These 3 FTE staff attributed to 1026 of the hours Corporate Legal spent processing FOI requests, with other members of Corporate Legal contributing the remaining 26 hours.</p>										
<b>GENERAL DATA PROTECTION REGULATION</b>											
30.	<p>The GDPR gives individuals the right to know what information is held about them, along with other rights, and provides a framework to ensure that personal information is handled properly.</p>										



31. Under the GDPR, an individual is entitled to access personal data held by an organisation, of which that individual is the data subject. Such requests for information are known as subject access requests. Other requests available under the GDPR are:

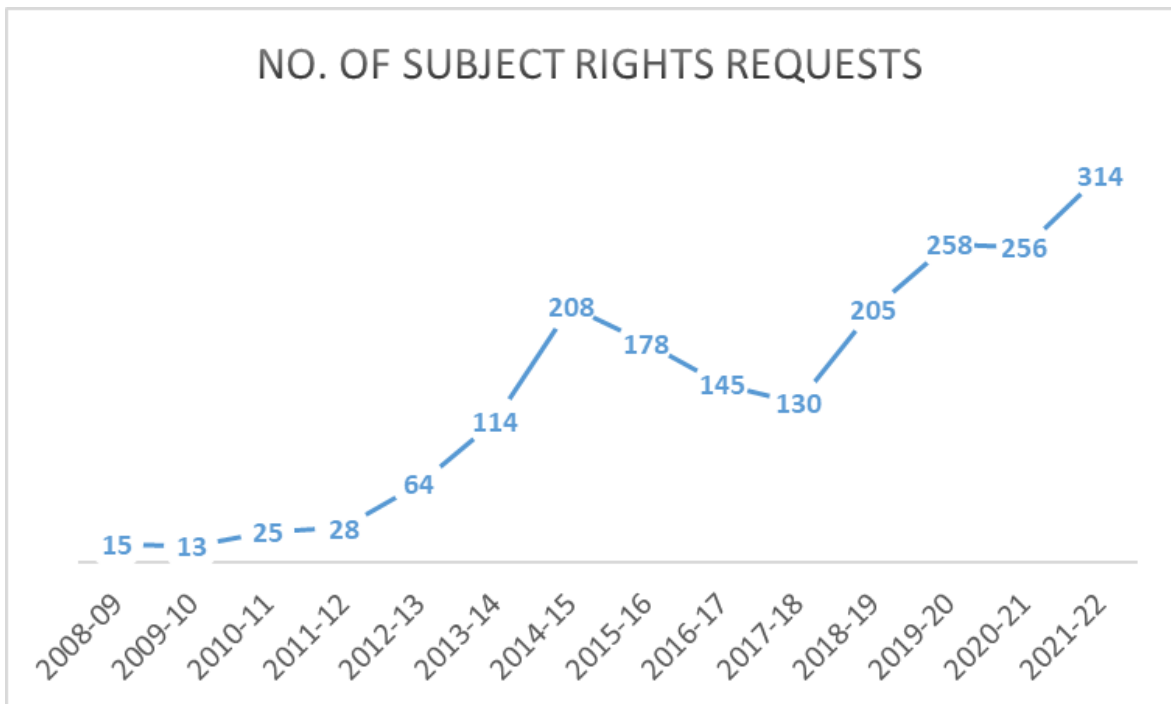
- Rectification
- Erasure
- Restriction
- Object
- Portability

The Council has to respond to such requests within one calendar month.

32. For the year 202-22, the Council received 314 rights requests, broken down as follows:

Request Type	No. Received
Subject Access	271
Erasure	23
Rectification	15
Objection	5

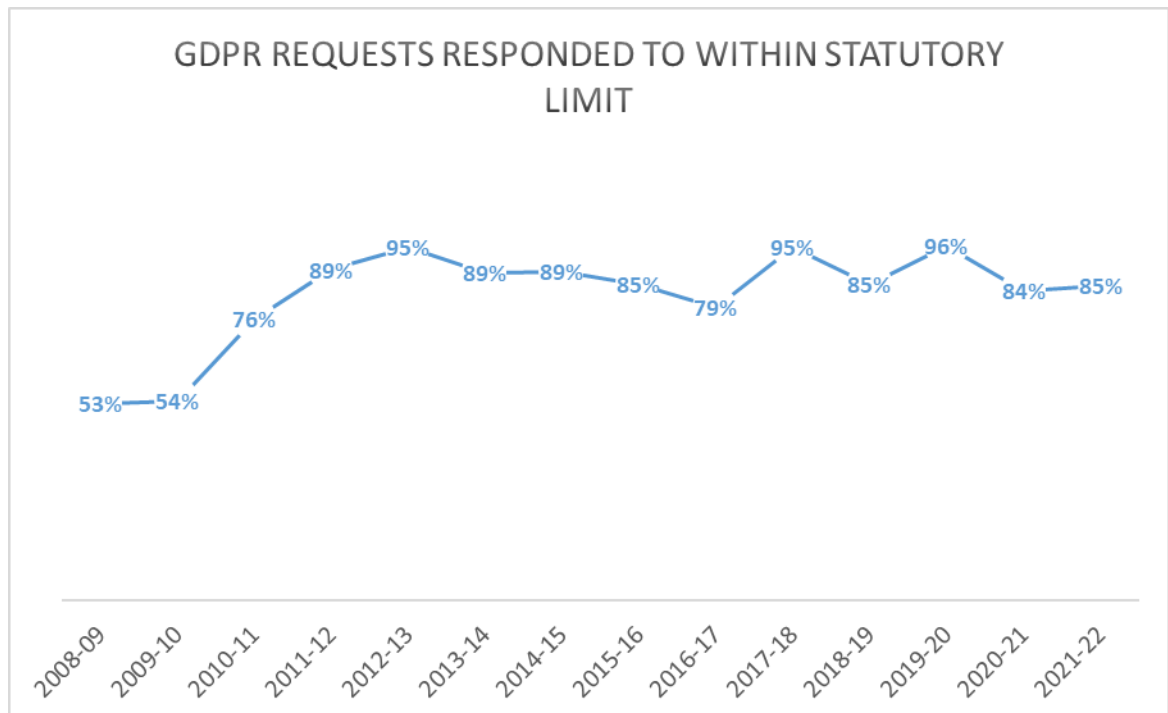
33. This represents an increase on last year, and the Council have continued to receive an increasing number of such requests since the introduction of the GDPR in 2018.



2021-22 has also seen an increase in requests other than subject access (such as objection and rectification requests), as the public (and companies) become more aware of these rights.

34.

85% of the requests were responded to within the statutory timescales compared with 84% last year. Again, the Council's target is 90% compliance.



This reduction can be attributed to the number of requests received by Children and Learning, who often have reduced capacity to deal with these complex requests. Also, as most of the requests involve social care data, the service areas holding this information were most affected by the pandemic.

35.

The Directorate breakdown is as follows:

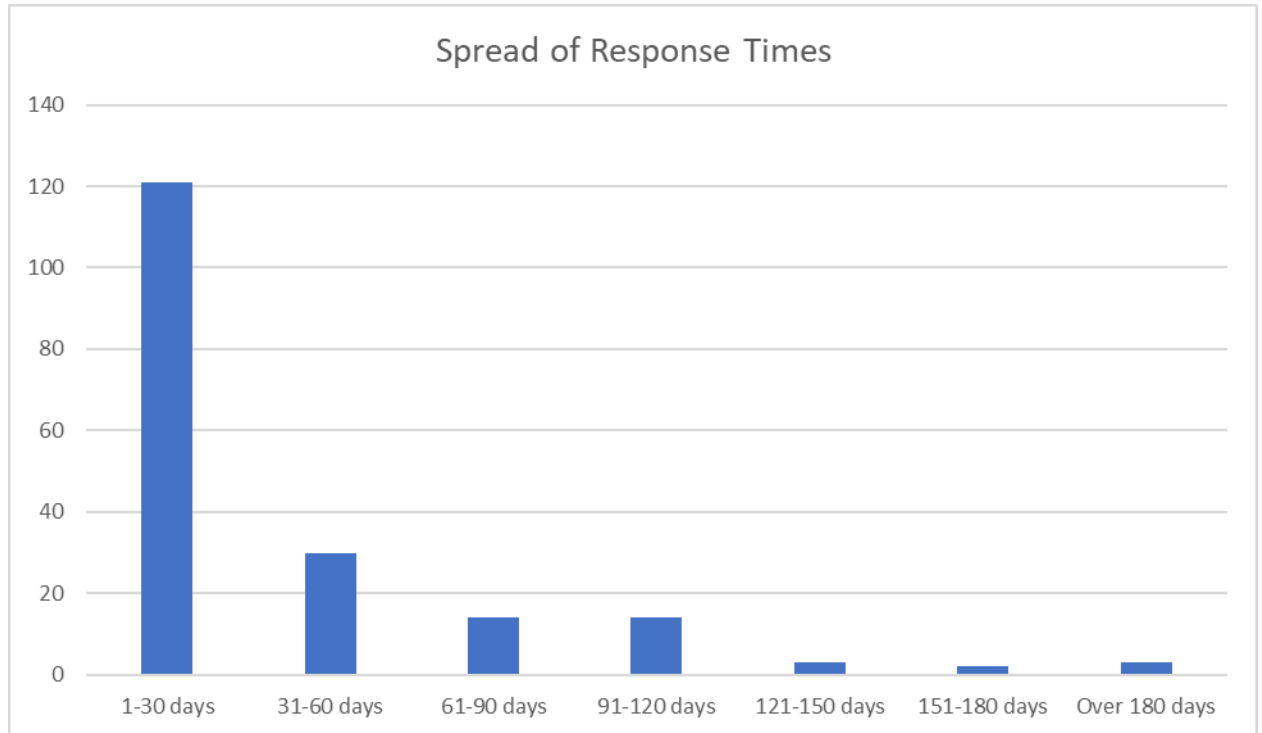
	No. Rec'd	Responded on time	Responded Late	Av. Days Taken
Wellbeing (Children and Learning)	183	82%	18%	49
Communities, Culture, and Homes	40	89%	11%	23
Finance	36	100%	0%	17
Wellbeing (Health and Adults)	22	93%	7%	33
Business Services	16	100%	0%	27
Place	10	100%	0%	22
Not allocated to Directorate	7	N/A	N/A	N/A
<b>Grand Total</b>	<b>314</b>	<b>85%</b>	<b>15%</b>	<b>41</b>

Compliance is calculated from the requests *responded to* within the year. This may include requests *received* in the previous year.

Requests are not allocated to a directorate when it is not clear what information is sought from the request. Clarification is requested, and if this is not received within 3 months, the request is deemed to be lapsed.

36.

The vast majority of requests were responded to within the one-month period.



It should be noted with SARs that the GDPR enables the Council to extend the deadline up to 90 days, if the request is particularly complex. As such, those that took up to 90 days may not necessarily be “late”.

37.

The delays generally occurred within the Children and Learning, which is to be expected as they receive the largest volume of requests. For requests that took over 100 days to respond to, the main themes were:

- Issues / delay in replacing and training the Children’s “Single Point of Contact” (SPOC) officer, a key member of staff who co-ordinates the responses to such requests.
- The introduction of CareDirector, and staff familiarising themselves with the different search / reporting functions and the storage of data.
- Complex requests, where there were concerns around the requesters’ parental responsibility / ability to make a request on behalf of a child, and risks around disclosure of the child’s personal data.
- Requests involving a large volume of historic records. In most cases, the Council were able to give a partial disclosure on or just after the statutory deadline and then would provide a monthly disclosure bundle until the SAR was complete.
- Carrying out necessary checks on disclosure regarding redactions

38.	<p>11 individuals requested internal reviews regarding decisions made to withhold, partially withhold information requested, or where they were generally unhappy with how their request was handled.</p> <p>The themes of the reviews are as follows:</p> <ul style="list-style-type: none"> <li>• The requester was not satisfied that the Council had disclosed all information it held on them</li> <li>• The requester was not happy with the delays in responding, and / or the application of the 2-month extension</li> <li>• The requester did not agree with the Council’s interpretation of what constituted their “personal data”.</li> <li>• The requester was not happy with the redactions applied to the documents provided</li> </ul>								
39.	<p>There were 2 occasions where the ICO contacted the Council in light of concerns they had about how a request was handled. One complaint was in respect of a late reply to a subject access request, and the other surrounded the Council’s decision to delete data that the individual believe should have been retained.</p> <p>Both complaints were addressed with not further action from the Commissioner.</p>								
40.	<p>Sometimes, there is a requirement to disclose personal data which might otherwise be in breach of the GDPR. Where an exemption from the non-disclosure provisions applies, such disclosure is not in breach of the GDPR.</p> <p>Examples of exemptions include crime and taxation and disclosures required by law or made in connection with legal proceedings. Such requests are typically made to the Council by regulatory authorities such as the police, the Department of Work and Pensions and so on as part of their investigations.</p>								
41.	<p>For the year 2021-22 the Council received 343 requests for data from such third-party organisations compared to 331 in the previous year.</p> <p>The top three requester types are as follows:</p> <table border="1" data-bbox="244 1294 762 1458"> <thead> <tr> <th>Type</th> <th>Requests</th> </tr> </thead> <tbody> <tr> <td>Police</td> <td>141</td> </tr> <tr> <td>Local Authority</td> <td>105</td> </tr> <tr> <td>Government Agency</td> <td>54</td> </tr> </tbody> </table>	Type	Requests	Police	141	Local Authority	105	Government Agency	54
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Police	141								
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42.	<p>In addition to these requests, the CCTV control room (City Watch) and Licensing Team received 1086 and 117 third party requests respectively (the majority of the Licensing requests were for footage from the vehicle Taxi Cameras). These requests are regulated by information sharing agreements, which removes the requirement to have each one authorised by Corporate Legal.</p>								
<b>DATA SECURITY INCIDENTS</b>									
43.	<p>During 2021-22, 204 data security incidents were reported to the Corporate Legal team, which represents a slight drop from last year’s 209 reported incidents.</p> <p>79% of these 204 were determined to be actual data breaches upon investigation, with the most common cause (49% of incidents) being data sent electronically to incorrect recipients.</p> <p>It should be noted that a “breach” could include an internal disclosure of information to the wrong member of staff, but as this information has not been shared externally, the detriment to the data subject would be deemed to be minimal.</p>								

44.	<p>The Council records the “severity” of the incidents reported, determined by a number of factors, including the nature of the information involved, the volume of data, and the possible harm the breach might cause to individuals involved. Any incident receiving a severity rating over 1 was considered to require a full investigation and remediation report.</p> <p>For 2021-22, the average severity of incidents determined to be actual breaches was 0.8.</p>
45.	<p>One of the data breaches were considered sufficiently serious to be reported to the Information Commissioner’s Office. This involved the verbal disclosure of sensitive information about an individual, which lead to the individual being relocated due to a potential risk to their safety.</p> <p>The disclosure was not explicit, and the ICO deemed that no further action was needed, as the incident had been adequately addressed by the Council.</p>
46.	<p>In all of these, the ICO considered that no further action was necessary as the Council had put into action adequate and robust remediation plans to address the risks to the individual, and ensure that such errors do not reoccur.</p>
	<p><b>NHS TOOLKIT</b></p>
47.	<p>In order to share information with our health partners, the Council has to provide annual assurance as to the standard of its information governance compliance. In the absence of any service information governance lead, the Corporate Legal Team again assumed short-term responsibility for collation of the Toolkit evidence. The Council was self-assessed at being 100% compliant with the mandatory evidence requirements, and the Council’s response was subsequently audited by NHS Digital, who confirmed that Southampton City Council could provide data security assurance to its health partners.</p>
	<p><b>RIPA</b></p>
48.	<p>Under RIPA, the Council as a public authority is permitted to carry out directed surveillance, the use of covert human intelligence sources and to obtain communications data if it is both necessary for the purpose of preventing or detecting crime and/or disorder and the proposed form and manner of the activity is proportionate to the alleged offence.</p>
49.	<p>There were no authorisations made under RIPA in 2021-22.</p>
50.	<p>Examples of activity authorised in previous years include covert surveillance of a victim’s home to detect acts of criminality, directed surveillance of individuals who were involved in fraudulent activities and a Covert Human Intelligence Source (‘CHIS’) was used to form an online relationship with a suspect to make a test purchase of suspected counterfeit goods.</p>
51.	<p>The Council is required to formally appoint a ‘Senior Responsible Officer’ for RIPA. The Director of Legal &amp; Business Services is the officer who undertakes this role. The Senior Responsible Officer has responsibility for maintaining the central record of authorisations; the integrity of the RIPA process within their authority; compliance with the Act and Codes of Practice; oversight of the reporting errors to the Surveillance Commissioner; engagement with inspectors from the Office of Surveillance Commissioners and implementation of any subsequent action plan.</p>

52.	<p>Training for Council officers involved in RIPA processes is regularly undertaken and is delivered by the Corporate Legal Team. Our documentation, procedures and training are also used as ‘best practice’ by a number of other local authorities and we regularly provide training for partner authorities on request. This year we delivered six training sessions to officers at Eastleigh Borough Council.</p>																
53.	<p>The Investigatory Powers Commissioner’s Office (formerly the Office of Surveillance Commissioners) carried out its most recent inspection of the Council’s management of covert activities in 2019, with the next inspection due in December 2022.</p> <p>In his report of December 2019, The Rt. Hon. Sir Brian Leveson, the Investigatory Powers Commissioner, noted:</p> <p>“(My) observations highlight good practice within (your) organisation and this has clearly resulted largely from a conscientious approach and internal oversight and the provision of regular training by Mr Ivory and Mrs Horspool. Both have been inspected in this regard for many years and are not found wanting”</p>																
54.	<p>The Council’s reviewed and updated Corporate Surveillance Guidance for 2022 is attached at appendix 1. It includes an enhanced paragraph (at paragraph 13) detailing strict arrangements for the retention and destruction of RIPA material.</p>																
<b>DATA PROTECTION IMPACT ASSESSMENTS</b>																	
55.	<p>Under Council policy, a Data Protection Impact Assessment (or DPIA) must be carried out for new projects.</p> <p>Carrying out a DPIA enables the Council to identify and address any privacy risks at an early stage, ensure a “privacy by design approach, and adhere to the accountability principle of the GDPR.</p>																
56.	<p>In 2021-22, the Council conducted 128 DPIAs, which is a slight increase on the previous year. This still represents a drop from pre-pandemic levels, but the DPIA process is still embedded within project management and procurement, giving Corporate Legal oversight with regard to any privacy risks associated with new endeavours, and ensuring a “privacy by design” approach.</p> <div data-bbox="379 1368 1353 1944" style="text-align: center;"> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>DPIAS UNDERTAKEN</caption> <thead> <tr> <th>Financial Year</th> <th>Number of DPIAs Undertaken</th> </tr> </thead> <tbody> <tr> <td>2015-16</td> <td>15</td> </tr> <tr> <td>2016-17</td> <td>26</td> </tr> <tr> <td>2017-18</td> <td>48</td> </tr> <tr> <td>2018-19</td> <td>139</td> </tr> <tr> <td>2019-20</td> <td>169</td> </tr> <tr> <td>2020-21</td> <td>125</td> </tr> <tr> <td>2021-22</td> <td>128</td> </tr> </tbody> </table> </div>	Financial Year	Number of DPIAs Undertaken	2015-16	15	2016-17	26	2017-18	48	2018-19	139	2019-20	169	2020-21	125	2021-22	128
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<b>RESOURCE IMPLICATIONS</b>	
<b><u>Capital/Revenue</u></b>	
57.	None directly related to this report. The administration of information law within the authority is managed within corporate budgets, but ensuring that the Council performs to an acceptable information governance standard and complies with the new statutory standards imposed by the GDPR and DPA18 places increased pressure on finite and already stretched resources.
<b><u>Property/Other</u></b>	
58.	None directly related to the report.
<b>LEGAL IMPLICATIONS</b>	
<b><u>Statutory power to undertake proposals in the report:</u></b>	
59.	The statutory obligations relating to information law are detailed in the body of this report.
<b><u>Other Legal Implications:</u></b>	
60.	None directly related to this report.
<b>RISK MANAGEMENT IMPLICATIONS</b>	
61.	The potential impact of the decision in terms of finance, service delivery and reputation is considered to be low. Although the report does highlight potential future pressures on service delivery with the advent of the GDPR, the decision of members in this report is to note the performance of the Council in terms of information governance for 2021-22.
<b>POLICY FRAMEWORK IMPLICATIONS</b>	
62.	The information contained in this report is consistent with and not contrary to the Council's policy framework.

<b>KEY DECISION?</b>	<b>No</b>
<b>WARDS/COMMUNITIES AFFECTED:</b>	None
<b><u>SUPPORTING DOCUMENTATION</u></b>	
<b>Appendices</b>	
1.	Corporate Surveillance Guidance – August 2022
<b>Documents In Members' Rooms None</b>	
1.	None
<b>Equality Impact Assessment</b>	
<b>Do the implications/subject of the report require an Equality and Safety Impact Assessment (ESIA) to be carried out.</b>	<b>No</b>
<b>Data Protection Impact Assessment</b>	
<b>Do the implications/subject of the report require a Data Protection Impact Assessment (DPIA) to be carried out.</b>	<b>No</b>

**Other Background Documents None**

**Other Background documents available for inspection at:**

<b>Title of Background Paper(s)</b>	<b>Relevant Paragraph of the Access to Information Procedure Rules / Schedule 12A allowing document to be Exempt/Confidential (if applicable)</b>
1.	None