

Data Protection Officer Figures for 2019

Email Volumes

The Data Protection Email boxes receive all queries from staff, schools and the public. It is not practicable to separate them by category, however the volumes received and sent over the past 12 months are given below.

Throughout the year, the SLAs for the Data Protection Officer mailboxes have been maintained with minor exceptions. These are 100% response to general queries within 2 working days, and 24 hours response to data breach reports (including on non-working days). The out-of-hours response is required due to the requirement to report serious breaches within a maximum of 72 hours as required by the law.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Received	478	475	478	397	587	455	638	478	448	441	567	352
Sent	284	301	265	235	339	259	324	176	361	254	216	201

This represents an average per week of 111 emails received and 68 responses sent. The difference generally indicates courtesy replies e.g. recipients acknowledging receipt of advice with thanks.

Breach Volumes

The Data Protection regulations require that we record all breaches and near misses, even if these do not reach the threshold for reporting to the Information Commissioner.

Two corporate incidents have been reported to the Information Commissioner during the year. In each case, they were closed by the Information Commissioner with no further action required.

Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	% of total
Accidental release	2	3	5	8	6	10	5	4	6	2	6	3	60	43%
Control failure	1	1				2	2	1	1	1	1		10	7%
Email spoofing	9	4	4	3	5	1			3		2	5	36	26%
Incomplete data														
Lost property	3	4	2	3	3	1	2	2	2		4	1	27	19%
Malware												1	1	1%
Near miss														
Process issues	1	2		1					1	1			6	4%
Resource issues														
Training issues	1												1	1%
Other														
Total	17	14	11	15	14	14	9	7	13	4	13	10	141	100%

It is difficult to measure against others in the industry as practice is evolving, however anecdotal evidence suggests we are on a par with other local authorities.

Article 30 Register and Data Protection Impact Assessments

One key change in the law with GDPR was the requirement to maintain a detailed list of processing activities which is available for publication, along with Data Protection Impact Assessments for all "high risk" processing. We have taken a precautionary approach and performed impact assessments of all processing; currently there are over 350 corporate purposes recorded and approximately 20 for schools. These are now reviewed every two years or when a change of legislation or processing supplier occurs.