



Audit and Governance Committee

28 November 2024

Title:	Information Governance – RSM Audit Actions
Report of:	Matthew Cumberbatch, Director for Legal & Governance
Lead Member:	Cllr Edna Murphy – Lead Member for Governance
Public Report:	Yes
Key Decision:	No
Voting Arrangements:	

Recommendations:

A	The Audit & Governance Committee is recommended to consider and note the contents of this report.
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Strategic Objective(s):

The proposals within this report fit under the following strategic objective(s):

	Achieving ambitious skills and employment opportunities
	Achieving good growth
	Increased connectivity
	Enabling resilient communities
	Achieving Best Value and High Performance

Delete as appropriate and include short explanation. Link to relevant sections in business plans.

1. Purpose

1.1	To update the Audit & Governance Committee on policies which have been updated at the request of RSM in a recent audit.
1.2	

2. Proposal

2.1	Provide an update to the Audit and Governance Committee on the GDPR policies for comment.
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3. Background

3.1	RSM were commissioned to perform an Agreed Upon Procedures (AUP) assignment, as part of the agreed Internal Audit Plan for 2024/25 of the current data governance processes, procedures and
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	<p>controls with regards to the General Data Protection Regulation (GDPR) and UK Data Protection Act (DPA) 2018.</p> <p>The audit was designed to assess the current control framework in place and to evaluate opportunities for future areas of controls development, based on the evidence presented. This takes into account both ICO guidance and relevant best practice identified at other similar organisations, providing a high-level framework of actions, where applicable.</p>
3.2	The Combined Authority's Data Protection and Information Governance work is a requirement of statute and needs to be undertaken in accordance with regulatory standards. It is a growing area of work which requires adherence to statute, guidelines, case law precedent and good governance.
3.3	The role of Data Protection Officer (DPO) is a statutory post and holds a great deal of responsibility within a public authority. DPOs monitor internal compliance, inform and advise on data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for the Information Commissioner's Office (ICO). The Information Commissioner's Office states that a DPO <i>must be independent, an expert in data protection, adequately resourced, and report to the highest management level.</i> (ICO, 2018).

4. Appendices

4.1	<p>The documents listed below have been updated or created as requested by the auditors and are attached. The policies have track changes to show changes which have been made</p> <ul style="list-style-type: none"> • Data Protection Policy – Appendix 1 • Data Retention Policy – Appendix 2 • Data Retention Schedule – Appendix 3 • Data Incident Reporting Policy – Appendix 4 <p>The document below has been created and is attached.</p> <ul style="list-style-type: none"> • Procedure for Handling Data Subject Rights – Appendix 5
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5. Implications

Financial Implications	
5.1	There are no financial implications
Legal Implications	
6.1	The Combined authority is under a duty to ensure that it processes, holds and releases any information in line with a range of legislative provisions including General Data Protection Regulation, Data Protection Act 2018, Freedom of Information Act, Privacy and Electronic Communications Regulations and the Human Rights Act.
Public Health Implications	
7.1	There are no public health implications
Environmental & Climate Change Implications	
8.1	There are no environmental and climate change implications
Other Significant Implications	
9.1	
Background Papers	

