

Date	23 February 2023
Item	14.0
Title	Information Governance Annual Review 2022
Author	Simon Blandy, Director of Governance
Purpose	To report on Information Governance in 2022
Recommendation	To NOTE the report
Timing	N/A
Impact assessment	This report provides assurance to consumers, regulated members and other stakeholders that we are meeting our obligations under data protection legislation
Impact on Regulatory Objectives	The assurance provided by this report has a positive impact on the following regulatory objectives: <ul style="list-style-type: none"> - Public interest - Consumer interest - Independent, strong, diverse profession
Implications for resources	No additional resource implications
Impact on consumer empowerment	N/A
Impact on ongoing competence	N/A
Publication status	For publication
Appendices (in supporting papers pack)	None

Introduction

1. The purpose of this report is to ensure the Board is aware of information governance compliance within CRL. This is the fourth information governance annual report to be presented to the Board.
2. The report reviews data protection compliance during 2022.

Background

3. The implementation of the UK General Data Protection Regulations (UK GDPR) and subsequent Data Protection Act 2018 introduced stricter requirements for the way organisations handle personal data with significantly higher penalties applicable for serious failings. It has also resulted in greater public awareness about the way organisations must behave, bringing with it greater likelihood of complaints if things go wrong and the potential for reputational damage.

Understanding Risk

4. CRL handles personal data, including special category data, to carry out its regulatory functions and comply with the regulatory objectives. CRL staff have a good understanding of the detrimental effect on CRL's reputation as a legal regulator if it mishandles personal data.

Compliance assessment

5. No high or medium level compliance information governance issues have been identified.
6. Staff and Board members undertake annual refresher training in data protection and information security and completion rates are monitored via monthly performance figures.

Data protection statistics

Data breaches

7. There were 7 reported data breaches in 2022 (3 in 2021, 4 in 2020). None were at the more serious level of breach that requires reporting to the Information Commissioner.
8. Staff are all up-to-date on both data protection and information security training. All staff were reminded at a staff meeting of the importance of continued compliance with data protection requirements.

Complaints

9. We received no complaints in 2022 relating to data protection.

Data Subject Access Requests (DSARs)

10. We received 5 DSARs in 2022 (6 in 2021, 3 in 2020). Of the 2022 DSARs, 4 were coordinated by CILEX. One related to an Enforcement Investigation.

Erasure requests

11. During 2022, we received one erasure request (1 in 2021, 5 in 2020) which was coordinated by CILEX. CILEX Regulation held limited data which was deleted.

Freedom of Information requests

12. We are not subject to the Freedom of Information Act. Whilst we respond helpfully to general enquiries, we do not collect statistics.

Recommendation

13. To Board is asked to **NOTE** the report.