

**SCOTTISH POLICE
AUTHORITY**

Meeting	SPA Audit Committee
Date and Time	24 July 2018
Location	Pacific Quay, Glasgow
Title of Paper	Information Commissioner's Office Data Protection Audit – Progress Report
Item Number	6.4
Presented By	CS John Paterson
Recommendation to Members	For Noting
Appendix Attached:	No

PURPOSE

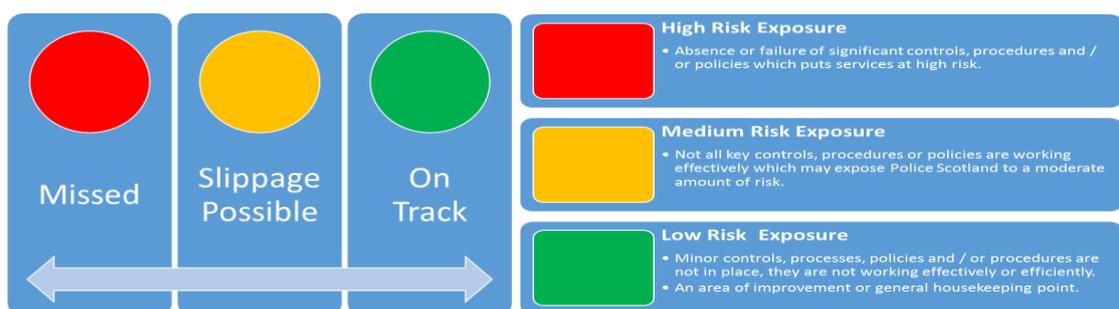
The purpose of this paper is to provide an update on the progress made by Police Scotland to address recommendations made by the Information Commissioner's Office (ICO).

1 BACKGROUND

- 1.1 Between September 2016 and September 2017, the ICO carried out an independent assurance audit to review the extent to which Police Scotland was complying with the Data Protection Act 1998.

The audit was carried out over three phases:

1. Data Protection Governance – responsibility, policies and procedures, performance measurement controls and reporting mechanism.
 2. Data Sharing – the design and operation of controls to ensure the sharing of personal data complies with the principles of the Data Protection Act 1998 and the good practice recommendations set out in the ICO Data Sharing Code of Practice.
 3. Security of Personal Data and Training and Awareness – the technical and organisational measures in place to ensure that there is adequate security over personal data held in manual or electronic form. The provision and monitoring of staff data protection training and the awareness of data protection requirements relating to their roles and responsibilities.
- 1.2 Following the audit, **136** recommendations were added to the Police Scotland Recommendations Tracker in September 2017.
- 1.3 As with all Police Scotland recommendations, a risk assessment is used for both risk exposure and to track progress with implementing recommendations against agreed timescales:



2. PROGRESS TO DATE

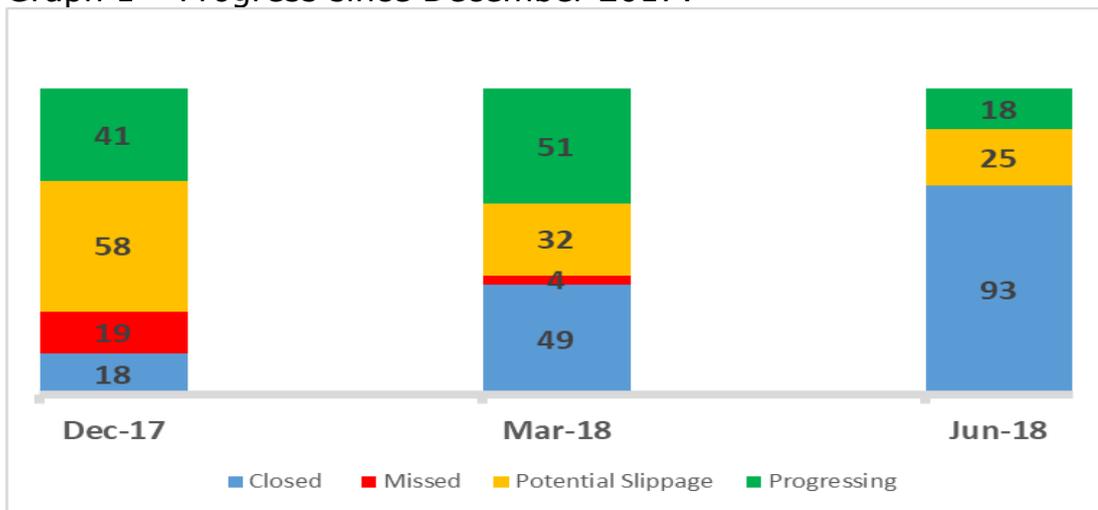
- 2.1 In January 2018, a prioritisation exercise was undertaken followed by a concerted effort to address these recommendations.
- 2.2 During April 2018, the ICO conducted a remote follow up audit whereupon staff reviewed Police Scotland's evidence submissions and provided a view whether recommendations had been

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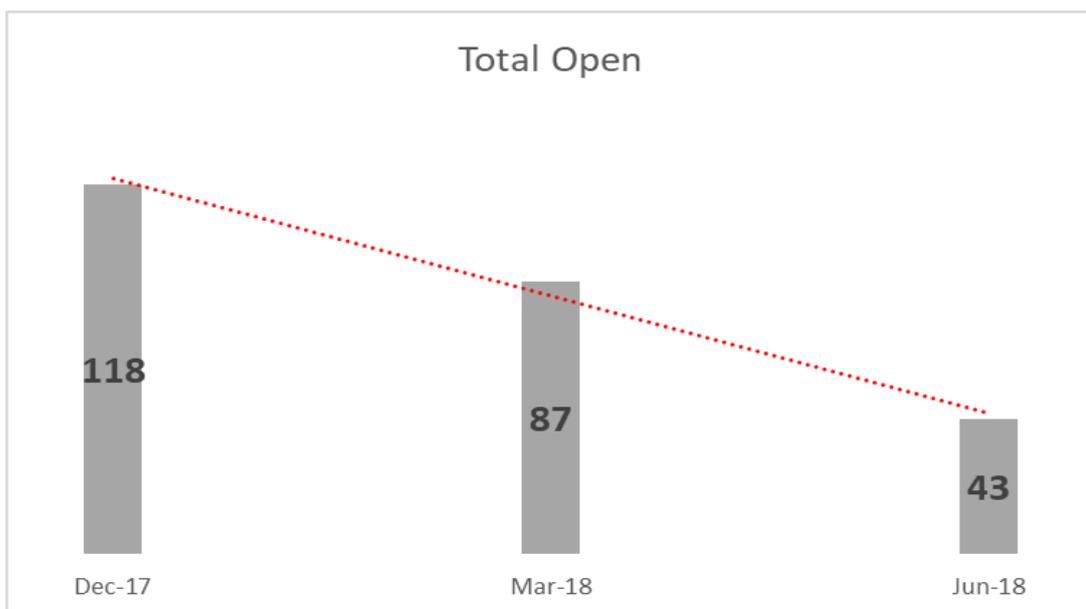
addressed or not. From this, the ICO assessed 63 recommendations as being implemented, 66 partially implemented and 7 as not implemented.

- 2.3 In June 2018, a Police Scotland Panel, Chaired by Chief Superintendent Paterson, reviewed the 66 partially implemented recommendations and due to progress made primarily through data protection reform, a further 30 recommendations were closed. At the date of reporting, Police Scotland has **43 recommendations still in progress.**

Graph 1 – Progress since December 2017:



Graph 2 – Reduction in open recommendations:

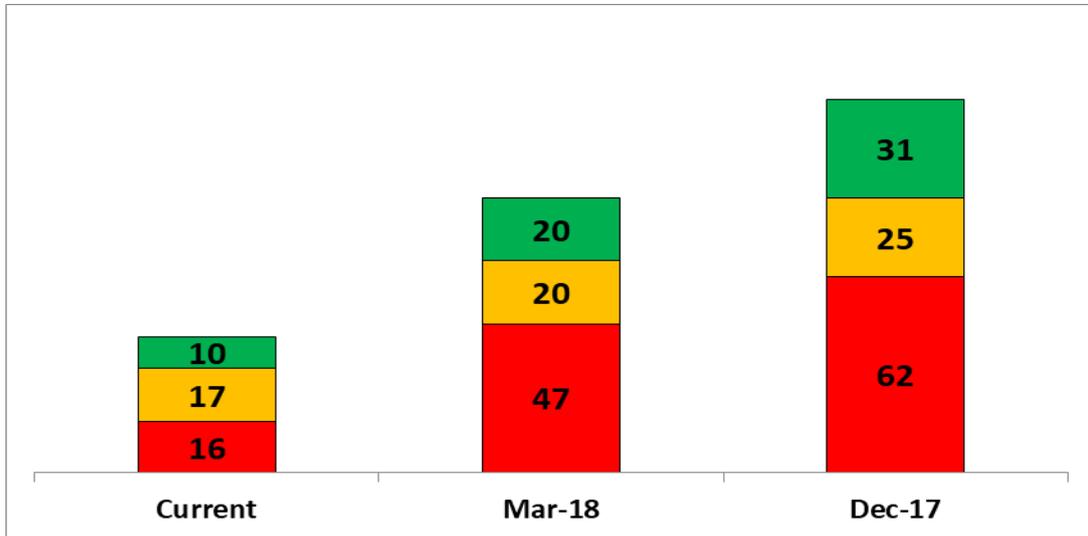


- 2.4 The graph below shows the total number of open actions according to their risk exposure since monitoring began in

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December 2017. There has been a significant reduction (74%) in the number of high risk actions having been addressed.

Graph 3 – Recommendations according to Risk Exposure since December 2017:



2.5 The following list provides a summary of the risks mitigated and improvements achieved:

- A number of the recommendations were addressed through achieving compliance with GDPR / data protection reform.
- A number of recommendations were addressed by reviewing Information Sharing Arrangements, providing updated templates and procedural documentation and introducing governance arrangements to quality assure agreements.
- General data protection training has been provided to all staff and other training is provided to subject matter experts and key individuals as necessary.
- Governance arrangements have been strengthened by introducing dedicated groups for the detailed discussion of Information Management issues. Escalation routes have also been documented.
- Roles and responsibilities have been reviewed, clarified and awareness has been raised.
- Enhancements have been made to performance reporting and dealing with information management risks.
- An annual audit programme has been put in place.
- Improved integration of information management requirements into project planning and delivery.
- General improvements to the physical security of buildings and information assets.
- Improved governance over the control of information and physical assets – including creation of an Information

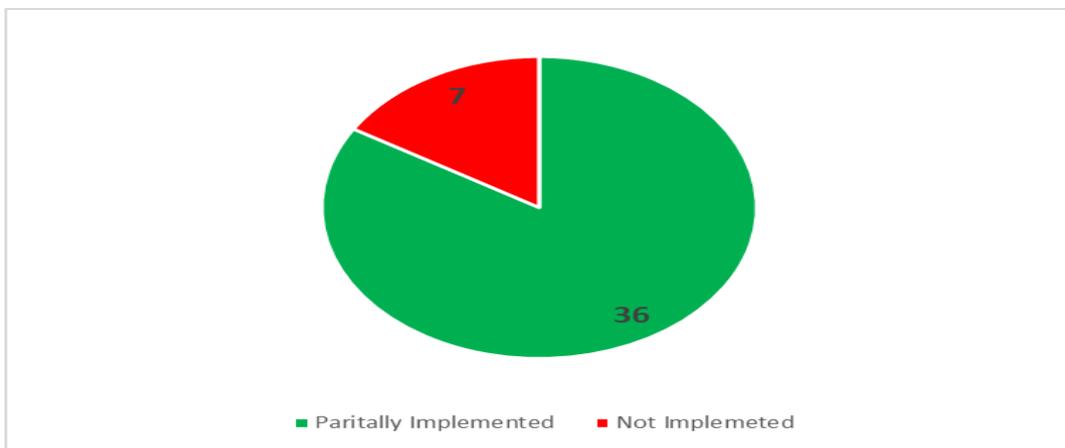
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Governance Board and Data Retention & Review Design Authority.

- Good practice identified within Concern Hubs shared across all local policing divisions.
- Enhancements made to technical security.

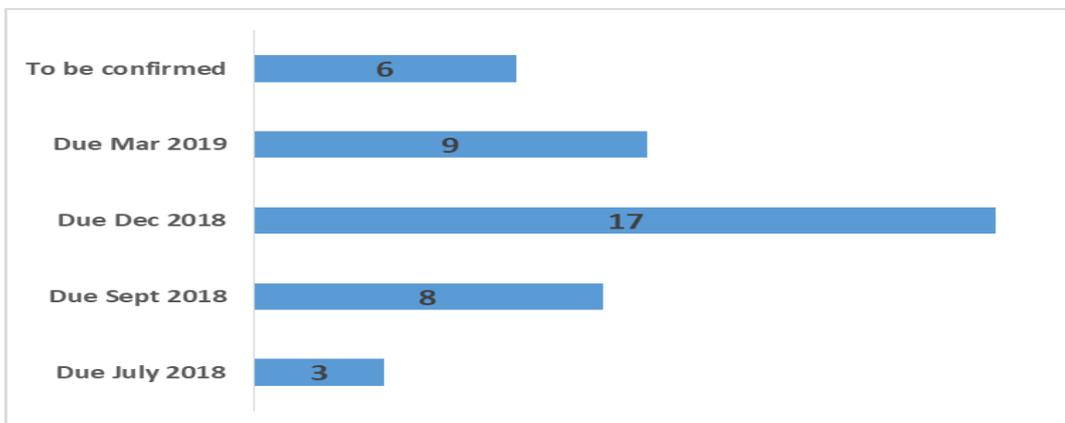
2.6 Of the 43 recommendations that remain open, 36 of these are at an advanced stage of completion and were assessed as partially implemented by the ICO. The graph below shows the proportion of open recommendations that are partially implemented and those that had not started or had not been implemented.

Graph 4 – Total proportion of recommendations that are partially implemented:



2.7 Police Scotland has reviewed what steps now need to be taken in order to address these outstanding recommendations fully and have set new timescales as depicted within Graph 5 below.

Graph 5 – Timescales for completion of the current open actions:



2.8 Providing work continues to plan, the following graph shows the incremental reduction in open recommendations over the next 9 months.

Graph 6 – Projected completion of open actions:



3 FINANCIAL IMPLICATIONS

There are no financial implications in this report.

4 PERSONNEL IMPLICATIONS

There are no personnel implications associated with this paper.

5 LEGAL IMPLICATIONS

There are no legal implications associated with this paper.

6 REPUTATIONAL IMPLICATIONS

There are potential reputational implications associated with this paper as failure to continue to progress any external Recommendations, Suggestions or Improvement Actions could result in the negative reporting of same.

7 SOCIAL IMPLICATIONS

There are no social implications associated with this paper.

8 COMMUNITY IMPACT

There are no community impact issues associated with this paper.

9 EQUALITIES IMPLICATIONS

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There are no equality implications associated with this paper.

RECOMMENDATIONS

Members are requested to:

Note the progress made by Police Scotland to address the recommendations made by the ICO.

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