

## MONITORING REPORT Q4 2021/22 - RECOMMENDATIONS NOT ACCEPTED

Audit Title	Date Final Issued	Assurance Rating	Recommendations Not Accepted			
			Report Ref	Risk Rating	Recommendation	Reason / Comments
Information Governance (GDPR)	02/02/22	Substantial	2.4.4	GP	An exemption certificate must be signed off by the Data Protection Officer in all cases where a full Data Protection Impact Assessment (DPIA) is not required	Discussed at IG Board 18/01/22. Agreed that the DPIA form will go online. Where the screening indicates that a full DPIA is not required (this to be calculated automatically), users can print off their own exemption certificate. The system will create a record which can be audited. Not accepted on the basis that an exemption certificate means the data being processed is not such that it presents a risk. Accepted that the DPO requires involvement in full DPIA assessments
			2.4.6	GP	A register of DPIA screening officers should be maintained by the DPO and all group members should be sent annual reminders to review their DPIA's by the DPO.	Managers checklist to be updated to include a question related to a reminder to review DPIAs. Not accepted there is a need for specific DPIA screening officers as this could depend on the specific project even within service areas.
			2.5.4	GP	Data Protection Training: The Data Protection Officer (DPO) should advise Corporate Learning & Development that the list of 'active accounts' needs to be updated to account for staff who have left the Council, allowing for accurate statistics to be obtained.	Not accepted. This is not the DPO's responsibility. This affects all mandatory corporate e-learning training of which data protection is only one. For example, there are far more Social Services-related mandatory courses where statistics are required.
			2.6.3	LR	Training for officers without computer access on Information Management / Data Sharing should be included as part of the training material being developed (where such training would be applicable to their job).	Not Accepted. We currently have no capacity to deliver onsite training or develop training materials for workers who do not have computer access. Training of this type has limited value since relatively few manual workers have access to personal data.