

**Resources and General Purposes Committee – 19th May 2025**

**Item 16 Information Governance Update**

**This paper provides a summary of current and planned activity in the areas above to provide an update for the Resources and General Purposes Committee. Where the approval/ratification of the Committee is required, this is highlighted at the appropriate points.**

This update covers the period of October 2024 – March 2025 and all areas of information compliance including; UK GDPR, Privacy and Electronic Communication Regulations, Freedom of Information (Scotland) Act, Environmental Information (Scotland) Regulation and the governance of records management that supports compliance in these legislative areas.

**Data Protection**

**Personal Data Breaches**

All information security incidents are notified to the Data Protection Officer under the Information Security Incident Procedures and a full register is maintained.

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| --- | --- | --- |
|  | **Current Reporting Period****October 2024 – March 2025** | **Previous Reporting Period****April 2024 – September 2024** |
| Breaches reported | 16 | 12 |
| Notified to the ICO | 1 | 0 |

One personal data breach met the threshold to notify to the ICO. The ICO were satisfied with our actions to contain the personal data and that we were taking legal advice on the matter. The ICO advised that they would not take any action against the college as a result of this breach.

**Data Subject Rights Requests**

The most common rights request received by the college is the right of access, known as a subject access request.

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| --- | --- | --- |
| **Request Type** | **Current Reporting Period****October 2024 – March 2025** | **Previous Reporting Period****April 2024 – September 2024** |
| Right of Access | 6 | 6 |
| Right to Erasure | 2 | 0 |
|  |  |
| No. of Late Responses | 0 | 0 |

NCL must respond to all requests within one calendar month, unless the request is considered complex. All requests were completed within one calendar month.

**Staff Training and Awareness**

The Data Protection e learning module now forms part of the All Staff Essential Learning and was updated for the 24/25 academic year. The modules are delivered via Moodle and is available to all Staff and Board members. 92% of current staff have completed the Data Protection Module this year.

**Complaints to the Regulator**

There has been no contact from the Information Commissioners Officer (ICO) in relation to any complaints that been made to them on how we process personal data or handle data subject rights requests.

**Data Protection Internal Audit**

The GDPR internal audit was included as part of the Follow-up audit carried out November 2024. Evidence was summited to the auditor on each of the 3 outstanding recommendations. Further evidence was submitted in January 2025 to confirm all outstanding recommendations were completed in December 2024.

**Freedom of Information**

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| --- | --- | --- |
| **Request Type** | **Current Reporting Period****October 2024 – March 2025** | **Previous Reporting Period****April 2024 – September 2024** |
| FOISA Requests | 16 | 12 |
| EIR Requests | 0 | 0 |
| Requests for Review | 0 | 0 |
|  |  |
| No. of Late Responses | 0 | 0 |

The requests included information on: ICT systems and procurement; pay awards; salary bands; ASN course cuts; inclusive communications and trade union subscriptions.

**Complaints to the Regulator**

There has been no contact from the Scottish Information Commissioner (SIC) in relation to any complaints or appeals that been made to them on how we have responded to any requests under the Freedom of Information (Scotland) Act.

Lorna Miller

**Information Governance Lead**

May 2025