

Performance Indicators in Fulfilling Statutory Information Requests – Reporting Period 1st April 2023 – 30th June 2023

Freedom of Information Requests

Below are some performance indicators on the number of requests received under the Freedom of Information Act 2000 and our compliance with statutory response timescales. Although FOI requests do not concern the compliance with handling personal data, these figures are relevant to demonstrate our overall compliance with statutory information requests that are of interest to the ICO.

Reporting year	No. of FOIs received during reporting period	No. of FOIs completed during reporting period (includes closed FOIs from previous spreadsheet)	No. of FOIs completed within the statutory timescale	No. of open FOIs (2023-24 spreadsheet)	No. of open FOIs (2022-23 spreadsheet)	No. of overdue FOIs (provided from Oct 2019 onwards)	Percentage compliance rate within the statutory timescale
Apr-Jun 2022	279	471	195	-	68	128	41%
Jul-Sep 2022	265	385	210	-	37	48	54%
Oct-Dec 2022	279	265	220	-	1	1	83%
Jan-Mar 2023	385	333	282	-	68	68	93%
Total for the Year	1,208	1,454	907	-	-	-	-
Apr-Jun 2023	332	316	260	62	68	103	82%
Jul-Sep 2023							
Oct-Dec 2023							
Jan-Mar 2024							
Total for the Year (up to Q1)	332	316	260	-	-	-	-

Please Note: Figures for **Number of open FOIs** and **Number of overdue FOIs** are as of 13th July 2023.

Progress Towards Achieving Backlog of Information Sharing Agreements

There are 122 ISAs awaiting action (not yet started or existing ones requiring review). The breakdown is provided below.

All 115 ISAs listed by the DPO and provided to the CDU, have now been reviewed and most of them are either already logged on IKEN, or duplicates. Therefore, these are already included in the figures below. There were 56 potential news ones which have now been added these to the figure for 'New - not yet started' which now makes that figure 109.

Civil Disclosure are reviewing all the ISAs to determine the last communication/correspondence. This is to help identify which ones maybe dormant and no longer required. The review is 50% complete and once completed, CDU will update the status of each case file.

	Apr-Jun 2022	Jul-Sep 2022	Oct-Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	Jun 2023
Existing ISA's to be reviewed									
Review Required	16	16	6	6	6	5	5	5	4
New Template Required	17	13	5	5	5	5	5	5	5
New ISA's/Queries									
Not yet started	118	125	122	122	122	110	111	121	124
With Business Area	38	38	23	23	23	22	22	25	25
With CDU Decision Maker	13	13	14	14	14	14	14	15	13
With Lawyer/DPO/IAO	10	13	11	11	11	10	10	10	10
ISAs that have been cross referenced with DPO list status to be updated	33	33	33	33	33	33	33	33	

Subject Access Requests

Individuals have the right under the data protection legislation to request their personal data. These numbers report of valid requests only and discounts those that were not validated (ie. no ID received, fee not received under DPA 98, nor scope of request defined).

Reporting year	No. of SARs received during reporting period	No. of SARs completed during reporting period	No. of SARs completed within the statutory timescale	Percentage compliance rate within the statutory timescale
Apr-Jun 2022	98	87	37	42%
Jul-Sep 2022	105	132	69	52%
Oct-Dec 2022	73	93	41	44%
Jan-Mar 2023	141	128	92	65%
Total for the Year	417	440	239	54%
Apr-Jun 2023	109	141	94	67%
Jul-Sep 2023				
Oct-Dec 2023				
Jan-Mar 2024				
Total for the Year				

Rectification and Erasure Requests

Individuals have the right under the legislation to request the rectification of their personal data and to request the erasure of their personal data (also known as the 'right to be forgotten').

Reporting year	No. of valid requests received during reporting period	No. of requests b'fwd from previous quarter	No. of requests completed during reporting period	No. of requests to carry forward to next period	No. of requests completed within statutory timescale during reporting period	Percentage compliance rate within the statutory timescale responded to during the period
Apr-Jun 2022	10	0	8	2	7	87.5%
Jul-Sep 2022	4	2	6	0	6	100%
Oct-Dec 2022	11	0	11	0	11	100%
Jan-Mar 2023	10	0	9	1	9	100%
Total for the Year	35	2	34	3	33	97%
Apr-Jun 2023	6	1	7	1	7	100%
Jul-Sep 2023						
Oct-Dec 2023						
Jan-Mar 2024						
Total for the Year (Up to quarter 2)	6	1	7	1	7	100%

Other Information Rights Requests

Individuals have other rights under the data protection legislation, these include: the right to restrict processing, the right to data portability, the right to object to processing, the right to object to automated decision making and the right to complain to the Information Commissioner.

These rights are exercised less often than the aforementioned rights, further information is provided below:

Complaints made by data subject to the Information Commissioner's Office (ICO)

During quarter 1 the reporting period, there was **2 complaints** made to the ICO by a member of the public in relation to the handling of their personal data or processing of their information rights (rectification related complaint).

Other Information Rights

Other than the aforementioned subject access requests, rectification and erasure requests and the right to complain, we have received **5 complaints** directly from the data subject with regards to the handling of their data.

Independent reviews

The DPO conducts independent reviews when individuals ask for them. This sometimes alleviates individuals from complaining to the ICO. This quarter (Q1 2023) there has been **1 independent SAR review and 2 independent reviews of Rectification and Erasure requests.**

Reporting year	No. of complaints from ICO	No. of Complaints from data subject	No. of SAR independent reviews	No. of REC & ERA independent reviews
Apr-Jun 2022	4	5	3	0
Jul-Sep 2022	0	2	0	1
Oct-Dec 2022	1	0	1	1
Jan-Mar 2023	1	0	1	0
Total for the Year	6	7	5	2
Apr-Jun 2023	2	5	1	2
Jul-Sep 2023				
Oct-Dec 2023				
Jan-Mar 2024				
Total for the Year				

Personal Data Breaches

The following data breaches have been received for the reporting period. These are confirmed data breaches and do not include those reports of data breaches that have been discounted following further investigation.

Reporting year	No. of confirmed personal data breaches reported	No. of breaches reported to the ICO	No. of breaches where we've notified data subjects
Apr-Jun 2022	173	2	1
Jul-Sep 2022	172	0	0
Oct-Dec 2022	83	0	0
Jan-Mar 2023	53	0	0
Total for the Year	481	2	1
Apr-Jun 2023	37	1	0
Jul-Sep 2023			
Oct-Dec 2023			
Jan-Mar 2024			
Total for the Year			

Progress Towards ICO Recommendations

This section reports on progress towards the completion of recommendations NYP accepted to implement following the ICO consensual audit in July 2019. The report will not include recommendations issued and actioned prior to July 2019, but instead will include recommendations issued as a result of data breaches, complaints made to the ICO and the ICO audit recommendations since July 2019.

Source of ICO recommendation	No. of recommendations	No. completed or rejected	No. outstanding
Following hard copy book data breach (outcome Aug 19)	7	7 completed	0
ICO audit (Jul 19)	53	44 completed (increase of 1)	9 in progress
Following disclosure of report breach (outcome Dec 20)	7	7 completed	0
Following disclosure of information to an employer (outcome Jan 21)	5	5 completed	0
Following disclosure of inaccurate DVDS notice (outcome Feb 21)	7	7 completed	0
Following Clearview AI incident (outcome Jan 2022)	0	2 completed	0
Following postal charge sent to nominal's previous address incident (outcome Jan 2022, inc reported 2 nd Nov)	3	0	3 in progress
Following an incident of verbal disclosure by Officer disclosing the home address of a victim/suspect affecting one individual (outcome Jan 2022)	5	2	3 in Progress
Following incident whereby driver was convicted twice of an offence (outcome March 2022)	3	0	3 in progress
Following incident whereby 3 laptops containing IIOC were misplaced (Outcome April 2022)	3	0	3 in progress
Following incident of unauthorised disclosure of allegations to family	3	0	2 in progress

members (Outcome May 2022)			
Following a PNB going missing in the public domain (outcome April 2023)	4	2	2 in progress

Progress Towards Achieving Backlog Activities Relating to Data Protection Legislative Reform

A Permanent Deputy Data Protection Officer (0.5 FTE) and a Temporary Deputy Data Protection Officer (0.5 FTE until 30 June 2024) started in post in May and 3 July 2023 consecutively. They underwent induction and they are focussing on data protection related matters and assisting the team with data protection incident handling. The temporary Deputy Data Protection Officer leading on backlog activity finished at the end of the fixed term contract on 30 June 2023.

There are currently 2 temporary Compliance and Data Protection Support Officer posts vacant in the team. This, combined with the increased workload and new starters being inducted, is causing an impact on the ability of the team to progress backlog work, however some progress has been made.

This report updates IAB on the work outstanding to satisfy the various compliance activities:

Source of backlog activity	No. of controls	No. of controls completed or rejected	No. of controls outstanding
ICO self assessment toolkit	241	236 (increase of 23)	5
APP College of Policing data protection standards	42	42	0
NPCC data protection controls	78	74	4
RSM internal audit report	44	40 (increase of 1)	4
Actions identified in internal information asset audit	435	378 (increase of 24)	57

Some of the controls from each source may overlap.

Training Compliance Rates – NCALT Managing Information Module

The MLE report has been transitioned since the last Information Assurance Board to a Dashboard and is live and available to line managers to view and action. Whilst the security permissions that have been deployed on the dashboard allow the DPO to have oversight of entire force percentage statistics, the hierarchical permissions allow only line managers to see numbers, and as such a monthly report is not created in the similar manner. In due course, a paper is to be presented to IAB with regards to options for reporting this statistic going forwards for DPO oversight on compliance.

The latest Dashboard (August 2023) shows the completion of the **Managing Information** package which was due for mandatory completion by 26th July 2019, now stands at:

Managing Information – Operational **90.71%** (a decrease of 1.13%)

Managing Information – Non-operational **65.27%** (a decrease of 18.42%)