

D&S IFCA's Data Audit by Officers

Officers' Recommendation

That Members note the Officers' Data Audit Report.

Background

The Authority holds data including sensitive personal data, and shares information with other bodies. It is important that it does so in line with relevant legislation. D&S IFCA has six policy documents relating to data, and personal data, collectively referred to internally as D&S IFCA's **Primary Policy Documents**. These are the following:

- D&S IFCA Data Protection Policy (a framework for other policy & guidance)
- D&S IFCA Data Protection Principles - Privacy Policy
- Freedom of Information Policy
- Technology Policy
- Publication Scheme Policy
- Information Management Policy

All Officers must, and have, confirmed in writing that they have read and understood the Primary Policy Documents. In September 2024, Members were informed that Officers would prepare a report annually on internal monitoring of adherence to D&S IFCA's data protection policies.

The Information Management Policy provides D&S IFCA with the basis for a highly organised system to manage and store data, as well as setting out the requirement for a **Data Protection Register** that is associated with the handling of and retention of personal data in electronic format. How Officers are addressing the management and disposal of data in paper format is also set out in this Officers' paper.

D&S IFCA's Data Protection Register

D&S IFCA's Data Protection Register lists the types/categories of personal data held by the Authority, what it consists of, where it is saved, why it is needed to be held, what it is used for (lawful basis), who has access to it, with whom data can be shared with, and how long it should be retained. The Data Protection Register is accessible to all Officers for reference.

Although all Officer's personal computers have password protection, personal data is not held on PCs (C Drives). Email which could contain personal data is relocated to specific files on the shared server, and all email (inbox, outbox, drafts and bin) are subject to a one-year retention period. The Data Protection Register currently identifies eight main categories of personal data as follows:

- (1) General Communications & Engagement
- (2) Management of Fishing Activity
- (3) Enforcement
- (4) Procedures

- (5) Consultation (specific work)
- (6) Research Work
- (7) Human Resources
- (8) Finance

The Data Protection Register also references detail regarding email retention. Shared folders on the D&S IFCA server, highlighted on the Data Protection Register, have different levels of accessibility for different Officers (access groups) depending on their need to access and use the personal information.

Sub-Categories:

Each main category is sub-divided into different elements/sub-categories, for example:

- The Enforcement Category includes details relating to intelligence, body worn video footage, and prosecutions.
- The Procedures Category includes details regarding customer complaints and formal requests for information.

Conducting the Audit

The unannounced audit was conducted by the Chief Officer and Principal Policy Officer on Saturday 18th April 2025 in D&S IFCA's Office. The Audit included the following checks which, regarding the exact files inspected, were selected as being the most important for the audit:

- Each personal computer (PC) – password, desktop documents, email (retention – all boxes), downloads to the PC and recycle bin.
- Selected files (shared files on computer server) – checking content as per detail on register, along with access from different PCs to the content. Eleven files were inspected, with spot checks on content held, and the age of the content compared to the expected retention periods.

The Findings of the Audit

There was a high level of adherence to the Data Protection Policies, in particular the lack of personal data on each of each Officer's PCs. Minor issues associated with each Officers' PC were explained by the Chief Officer on a one-to-one basis and rectified by the Officer concerned. The content of the shared files was broadly in keeping with the detail set out on the data protection register. Between 29th May and 30th May 2025, eleven D&S IFCA laptop computers were inspected, with no significant issues identified. This represents the majority of D&S IFCA owned lap top computers.

Moving Forward

There is a potential that some retention periods (initially set out on the Data Protection Register as being reasonable, rather than a legal requirement) can be amended. Officers are also discussing potential changes to the Data Protection Register to remove any uncertainty that may exist regarding the content that should be in particular files, potentially better defining the data being held to help identify when it should be disposed of. Other changes will include the removal of some files completely that are no longer needed. The Chief Officer has informed all Officers that another audit could take place at any time, and within the next twelve months.

Going Paperless:

Regarding the storage and handling of data, the intention is that D&S IFCA keeps moving forward, wherever possible, towards a paperless system. A lot of paper documentation is now scanned, turning it into electronic data, and therefore making it easier to manage. Although often labelled and locked, filling cabinets and desk draws containing older paper data can be challenging to accurately identify, and manage correctly. Data handling, retention and disposal considerations are continuous, and regarding storage, large volumes of paper data can become an issue.

There is seldom need for Officers to refer to paper documents given the transition to electronic filing. There are no plans to conduct an audit of paper data held in the D&S IFCA Offices and, other than documents that must be retained and accounted for, all other paper documentation will be gathered together and suitably disposed of by the end of September 2025, with assistance from an external contactor.

Data Protection Breaches FY 2024/2025

Any significant breaches of D&S IFCA's data protection policy is reported to the Information Commissioners Office.

The following incidents were reported:

Date of incident/date reported to ICO	Detail
7 th May 2024	Sharing of email contact details from D&S IFCA's contact list/s as part of direct group communications (e.g. not using BCC function)
18 th December 2024	Sharing of email contact details from D&S IFCA's contact list/s as part of direct group communications (e.g. not using BCC function)

Following these two incidents, the ICO did not feel it necessary to take any further action. Internal guidance and the process for undertaking mass email communications was amended. The Officer responsible for both breaches is no longer employed by D&S IFCA. The disclosure of personal information was formally raised with the Officer, but the exit interview confirmed that their resignation was not as a result of the errors made handling personal data.

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Background Papers

Authority meeting papers and minutes – 19th September 2024

- D&S IFCA's Primary Policy Documents ([Section D - Website Resource Library](#))
- D&S IFCA's Data Protection Register