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Date: 22 May 2023

Dear Anthony

**SIRO's ANNUAL OPINION TO SUPPORT THE GOVERNANCE STATEMENT IN THE ANNUAL REPORT AND ACCOUNTS FOR YEAR ENDING MARCH 2023.**

I am required by HMG Security Policy Framework to provide you with an annual assessment on information risk to help inform the governance statement in the annual report and accounts.

I have consulted the several Information Asset Owners within Transport Focus and will additionally share this letter with the Audit and Risk Assurance Committee at its next meeting. I shall also place a copy of this letter on our website.

Information Asset Owners keep their information assets under review during the year and provide a monthly statement to the Corporate Services Director in their budget holder declaration.

The Information Strategy Group (ISG) has generally met quarterly and, when it does, reviews matters of information risk. This includes issues that we consider to be relevant and proportionate, and may be based on any guidance from the Audit and Risk Assurance Committee (ARAC). The ISG also conducts a quarterly risk assessment for each information asset which is then reviewed by the ARAC. Given the many changes in personnel over the last year, ISG has not met formally for a while. The next scheduled meeting is 27 June 2023, at which important updates, previously workshopped, to the Data Protection Impact Assessments will be discussed and agreed.

I have spent some time with the IAO / DPO at London TravelWatch, this year, assisting in bringing the LTW RoPA up to date, and other matters. This collaboration remains particularly important given the enduring data processing arrangements between the two organisations.

The year under review has been another one of significance in respect of information risk.

As I mentioned this time last year, the UK's withdrawal from the European Union took full effect on 31 January 2021 and 2022-23 has therefore been a year of 'settling into' UK-GDPR. A full update of the Information Risk Handbook remains pending, but the general thrust of its provisions remain extant.

You will recall that, in Autumn 2021, I commissioned a Data Protection Compliance Review through Garden City Assurance, a boutique DP consultancy of which Suze Phillips CIPP/E CIPM is the Principal. An initial report was provided to the January 2022 meeting of ARAC with an update in May 2022. The basis of the report was the ICO Accountability Tracker, and interviews were held with all teams as well as a thorough process and documentation review. The quarterly information risk assessment and data map – otherwise known as the **Record of Processing Activities** or RoPA - referred to above has been subject to a thorough overhaul during 2022-23. Much work has also gone into the updating of our **data protection impact assessment screen** within project workbooks. This will be rolled out during Q1 2023-24. I have taken account of the recommendations of the Government Internal Audit Agency information governance audit, completed during 2021-22, in this work.

As I reported last year, our staff will again be asked to complete mandatory awareness training this year. I have contracted with a new supplier for this activity, and we are working our way through the (many and) various modules it offers.

In respect of current projects, data privacy impact assessment screens in project workbooks are completed routinely, and no project is sent for approval unless the screen has been reviewed and authorised by me.

The Collaboration Agreement (CA) with London TravelWatch has now been fully updated for the third year and is to be re-approved by our Board in May 2023. The two data processing agreements annexed to the CA remain extant.

I have advised on many data protection issues, and concluded several data processing agreements, over the course of the year.

Compliance with Freedom of Information Act requests and other requests in respect of GDPR rights (subject access, rectification, erasure etc) during the year has been good, and all are reported to the quarterly ARAC meetings. Our casework team continues to manage the flow of such requests efficiently and effectively. A review of the information we regularly provide under our Publication Scheme is also complete, although it has yet to be republished.

I am pleased to report that we have now recruited a new member of the chief executive's team who will, over time, develop a working knowledge of information management issues. But I stress

that the time available to devote to data protection issues remains very limited, and is probably insufficient, and for this reason the advisory arrangement with Suze Phillips is continuing.

I am of the opinion that, in respect of information risk, both Transport Focus and London TravelWatch remain low risk organisations, and that the actions we have taken as described above are relevant and proportionate to the risks we face. **There have been no reportable data breaches during the year.**

**I would therefore advise you that you should have no concern in claiming broad, proportionate, compliance with HMG Security Policy Framework (as it relates to information risk), and the data protection regulations currently in force, within our annual governance statement.**

Finally, I should like to add that those staff directly involved in the management of data take their responsibilities very seriously. I am very grateful to all of them for this – it would be impossible for me to do my job if this was not the case. This group not only includes our information asset owners, and casework team, but others whose help in managing data in general.

Yours sincerely,

*Jon Carter*

**JON CARTER**  
**Head of board and governance**  
**Senior Information Risk Owner (SIRO) and GDPR-UK Data Protection Officer (DPO)**